

Submitted By
Jacyn Schmidt
Submitted On
12/22/2021 2:58:22 PM
Affiliation



PC151
1 of 1

I am writing in support of proposals 156, 157, and 158, and in opposition to proposal 159, 160, 161, 163, 164, 165 and 166.

I'd like to include an excerpt from Thomas Thornton's Herring and People of North Pacific:

"Marine biologists argue that herring and other forage fish are too important for their 'ecosystem service' values to be 'maximized' for extraction by a small group of fishers and exported to foreign markets. The stakes are high and the potential for collapse is real under current Maximum Sustainable Yield policy. Even if the fishery avoids collapse, the undue pressure of commercial maximization has meant that subsistence users are not getting enough eggs to satisfy their needs, especially in their customary and traditional use areas. (page 5, introduction)"

Regarding proposal 159: There are NOT already ample provisions protecting subsistence resources - according to the Sitka Tribe of Alaska, subsistence harvest needs have not been met in 8 out of the last ten years. Subsistence needs must take precedence over commercial fishing because they are essential to the physical, economic, traditional and cultural wellbeing of Native people.

I am deeply concerned about the wellbeing and long-term health of herring in the Sitka Sound. I agree that using modeling, measurements, and tested methods will lead to the best assessment of the situation and ensure the long-term health of the herring fishery. I urge you to consider Tlingit science, alongside Western science in how you advise these management decisions. Tlingit science is rigorous and has been practiced for several thousands of years, is based on observations and understandings of the world, and has proven management success - which is not true for Fish and Game managed herring fisheries historically across Southeast. Management decisions are stronger if and when they consider BOTH Western and Tlingit sciences. We should be so /lucky/ to hear from Indigenous experts who know the subsistence needs and status of sacred herring better than anyone else. And... as many people in Sitka can attest - herring are too valuable and precious to take any risk on - I ask that you listen to subsistence experts and use Tlingit science in your decision making.

Proposals 159, 160, 161, 163, 164, 165, and 166 lack good scientific justification, disrespect subsistence users and modern traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. None of the proposals go far enough to advance respectful stewardship and protect the herring for generations to come, but proposals 156, 157, and 158 get us closer to that goal.



December 20, 2021

Alaska Board of Fish
RE: Support for Proposal 83

Dear Board of Fish members,

My name is James Daniels. I am the owner of Highliner Lodge & Charters Inc, and president of the Pelican Charter Fishing Association. I am writing on behalf of both entities today to support the adoption of Proposal 83. Although there are six other charter fishing businesses operating in, or out of, Pelican, I will detail only the economic contribution of the Highliner Lodge.

Highliner Lodge & Charters Inc. employed 19 individuals this past summer, 4 of which are employed year round. This does not include my wife and I, who are also employed year around by the Highliner Lodge. We employ more people than any other entity in Pelican. (Pelican's population is about 45). Not including my wife and I, the payroll (plus tips that our crew received) was over \$920,000 this year.

Highliner Lodge & Charters Inc. alone pays one third of all property taxes collected by the City of Pelican. We are the single largest consumer of all city services at the Pelican Small Boat Harbor, Pelican Fuel Dock, Pelican Utility, etc. We pay moorage and support services for 13 vessels and our average purchases from the City of Pelican over the last three years was about \$200,000. We utilize Alaska Seaplanes exclusively to transport or crew and guests in and out of Pelican; that expense was well over \$250,000 in 2021. Our total tax paid to the city was \$61,000. The City of Pelican has raised a new sales tax that will tax 2% of our gross income, so we will be paying an additional \$70,000 in 2022. In 2023 our city sales tax doubles to 4%, that will add another \$70,000 to the city coffer. That is a total of \$201,000 in taxes to the City of Pelican if our business level remains the same.

Although we are the largest charter fishing company in the Pelican area, if you added the half dozen other businesses to this tally, these numbers would increase by about 50%.

Clearly, our economic impact on Pelican, a city of 45 individuals, is enormous.

We buy all of our supplies out of Juneau. (\$539,000 in 2021)

King salmon is an essential part of our business, particularly in May & June. Without king salmon, we would have a very difficult time attracting business. We support proposal 83, because it would allow the charter fleet in SE Alaska a more steady, reliable catch of king salmon from year to year. We would gladly forgo our customers being able to keep 2 kings per day, and/or a relatively high 4-6 kings per season in



years of high abundance; so that our customers could count on keeping 1 king per day and a lower annual limit per season per customer in *all* years.

It is very difficult to market a charter fishing trip to Alaska when our prospective customers can't know in advance that they will be able to keep a king salmon. What is possibly worse for our business is trying to explain why, after they have purchased a king salmon stamp, they are not allowed to keep *any* king salmon.

I am an Alaska resident, and I have commercially trolled for salmon and long-lined for halibut and sablefish for over 40 years in Alaska, and I still participate in those fisheries. I understand the need for conservation. I believe that the commercial fleet should not lose harvest opportunities because of a growing charter fishing fleet. I have previously testified to the Board of Fish that my charter fishing business could get by on *only* one halibut per day and slot limits reducing the size of that halibut, because I do NOT support taking fishing opportunities from the long established commercial fishing fleet to give to the newer growing charter fishing fleet.

It is my understanding that Proposal 83 does not reduce the commercial king salmon catch overall, they can mop fish up in an August king salmon opening if they haven't caught their own quota earlier in the season. Our guests have no opportunity to claim their "lost" king salmon. We are marketing a *chance* to catch a king salmon, we don't need to catch a lot of king salmon.

Please consider this argument for supporting proposal 83.

James & Jill Daniels
Owners
Highliner Lodge & Charters Inc.
steve@highlinerlodge.com
907 738 1606

James Daniels
President
Pelican Charter Fishing Association

Submitted By
James Erickson
Submitted On
12/21/2021 7:54:04 PM
Affiliation
Subsistence user



PC153
1 of 1

First, I am a subsistence user. 2nd, I believe herring are a Big part of a important marine food chain. The commercial herring fishing frenzy is in a word wrong not to forget crazy unsafe. I support: 156,157,158. I oppose 159, 160,161, 163, 164, 165.



Submitted By
James Carter Hughes
Submitted On
12/20/2021 2:25:38 PM
Affiliation
self

Comments by James C Hughes, representing myself on Proposals:

80 through 92, 95,96, 101,103, 144, 225

Madam Chair Marit Carlson-Van Dort and members of the Alaska State Board of Fisheries (BOF):

Thank you for the opportunity to comment. My name is Carter Hughes and I am a Sitka based troller. I also crew on a longline vessel when catching my halibut and sablefish IFQ. I have been in the Alaska Commercial fishing industry since 1984 and have owned and operated my own vessel since 1993. I have spent most of my adult life fishing in Alaska and for over 30 years I have been involved in fisheries issues. I sat on the Alaska Trollers Association (ATA) Board from 1995 to 2011. I have been on the Seafood Producers Cooperative (SPC) Board since 2014. Most of my comments will be directed towards proposals that directly or indirectly impact the salmon troll fishery. In particular, I will be commenting primarily proposals that will cause a large change in the Southeast Alaska King Salmon Management Program (KSMP).

Before I start my comments on the proposals that impact the SEAK KSMP, I want to bring some things to the attention of the BOF. The Pacific Salmon Treaty (PST) was established in 1985. Since 1998, the PST has been renegotiated every 10 years. During that 3.5 decade span, Alaska has taken cuts at every cycle of negotiation. The Northern Panel, the team of stake holders that represent the various user groups in Alaska, provides for two seats for all industry groups, including the tourist driven recreational sector. During the lead up to the 2018 agreement, a particularly tough round of negotiations, all user groups were aware of the potential restrictions that could occur. The restrictions were harsher than expected, however the Northern Panel members were part of that negotiation. Part of the latest PST agreement is that Alaska CAN NOT go over it's PST king quota for any reason. If Alaska does go over its quota, there are harsh penalties and the fish MUST be paid back the following year. There is also an upper bound on the highest tier of abundance levels that restricts Alaska from harvesting as many kings as it could at former very high levels. Given that the latest PST requires Alaska as a user group to stay with in its quota bounds and pay back any overage the following year, regardless of abundance levels or trends, and that those terms were signed and approved by all the members of the Northern Panel along with the Commissioners, there is no reason to provide for an individual user group's overage without a rigorous and immediate payback method. This is especially true of the groups that make money off of harvesting king salmon, whether they be "commercial" fisherman or businesses that derive their income by providing for nonresident harvest of king salmon. As for the resident angler, they have been at a stable level of harvest for most of the time that the PST has been in place. The troll fleet and the net groups have had limited entry since prior to the establishment of the PST and thus they are stable by the fact they can't grow in size as a fleet. This is not true of the guided and unguided nonresident harvest group. They are not a stable user group and their growth is their own issue to deal with inside the boundaries of their allocation.

There is another issue that the BOF should consider. There are currently 7 Chinook Stocks of Concern (CSOC) listed in SEAK. Most of the CSOC were initially designated in 2018 at the request of ADFG, at the January, 2018 BOF meeting in Sitka. All user groups have taken cuts to preserve the CSOC. These cuts have involved time and area closures in known migration corridors that the CSOC transit on the way to their spawning rivers. The troll fleet in particular has lost the last 6 weeks of the winter king fishery, which typically is the most productive weeks of the fishery and also the time with the highest amount of AK produced hatchery kings present in the winter harvest mix.

An important component of producing hatchery fish at the regional hatchery programs, is the 3% enhancement tax that is assessed to all the commercial gear groups based on the landed value of their salmon at the dock when they sell. The troll fleet has lost much of its harvest access to AK hatchery produced kings with time and area closures during the months of May and June as well. These openers were in areas that were designed to increase AK hatchery king harvest and constrain Treaty fish harvest. The openers initially were established in the 1980s to allow for some troll fishing opportunity in the Spring to mitigate cuts taken at the PST. Many of these openers and the areas were designed by cooperation with the Regional hatchery associations (NSRAA and SSRAA), ADFG and troll fleet input. Unfortunately some of these areas were in corridors that were prone to CSOC migration at the times of the openers. Some of these corridors are still open to heavy harvest effort from the recreational fleets that fish out of the lodges, both guided and unguided. This is especially true of the Cross Sound, Lisianski Inlet area. Troll hatchery openers were closed there to prevent the interception of CSOC and now the harvest effort has been replaced by the lodges in the area, that are not monitored or sampled. The guides submit logbooks, which is helpful, but the bare boat lodge boats do not. And because the kings landed at the remote lodges aren't sampled, the recreational impact on the CSOC in these areas is unknown.

Finally, the BOF should be aware that the State of Alaska and the National Marine Fisheries Service are currently the defendants in a lawsuit being heard in the Federal District Court of Washington State. ATA is also a party to this suite. The suite alleges that the harvest of



king salmon in SEAK is contributing to the decline in the Southern Resident Killer Whale (SRKW) population. The primary stocks of Chinook that the SRKW feed on are Puget Sound Chinook runs and do not migrate to the far north in significant numbers. There is years of evidence from fisheries data collected, especially from the troll fleet, to support this. However, despite NMFS explaining this fact to the Court, the Court has chosen to disregard the information. Currently, the Court is still undecided on how to address the situation. That said, it is entirely possible there could be substantially larger cuts in king salmon harvest dictated to Alaska by the Court. All user groups must be prepared to harvest less king salmon. Now is not a good time to be making major changes to the SEAK KSMP or to set a precedent of one user group being allowed to exceed its limits without consequence.

Now I will address specific proposals.

Proposal 80: I support the idea of Proposal 80 submitted by ADFG with the caveat that I want individual groups within King Salmon Management Plan harvest regime to be accountable for their own overage.

Proposal 81: I support this proposal but would like to note that there is already a similar mop up regulation in effect. Also, given the growth in the guided and unguided recreational harvest by nonresidents, this situation is not likely to occur very often in the future unless something catastrophic occurs to the national economy or another pandemic or this pandemic flares up as happened in 2020. The most likely scenario, given that there is no limited entry scenario for the guided sport fleet or limit on the number of bareboat charter lodges or the vessels they may own, is that there will be little need for the application of this regulation. Still it is a tool that ADFG can use to closely manage the total harvest of Chinook if necessary.

Proposal 82: I support the ADFG proposal 82 with the modifications suggested by the Sitka Advisory Committee that are intended to protect access for resident anglers. I would also like to note that the Dept is asking for guidance on how to apply in season management to the recreational fishery and whether it should be managing to the 20% on a yearly bases or on an averaging of years. I support the use of in season management as a necessary tool for managing the recreational fishery given the current growth trend in lodges and their fleets. I support using in season management to meet the 20% harvest level for each individual year as there is no explicit payback method currently in regulation for a user group that goes over its allocation boundary. It would be inconsistent with the PST to not manage to the individual year. ADFG must manage to the individual year with respect to the total Treaty harvest of Chinook.

Proposal 83: I strongly oppose this proposal. The mechanics of this proposal are flawed. Without limited entry for the guided sport sector and nonguided sport sector (a limit on lodge ownership of vessels for clients or something similar), the 80/20 average will never be achieved in the long run. The number of vessels and lodges that are harvesting Chinook, and other fish species for nonresident (tourists) is increasing. The king salmon quotas that will be available are significantly lower than they were in the 1990s, when the referenced previous method of management in this proposal was in place. The tourist based recreational harvest season is about 2 months longer than it was in the 1990s. At the time of the former management regime, most of the guides and lodges were booking clients primarily from Memorial Day to Labor Day. Now the majority of the fleet is active from early May to mid-September. Also, there were very few unguided (bare boat charter) lodge operations in the 1990s. Now there are many, and the number is growing. The idea that an 80/20 allocation average can be achieved under this suggested regime is not realistic. The authors of this proposal had members of their organization sitting on the Northern Panel as a stake holder representative for the recreational sector. They are well aware that the latest PST agreement requires that all groups make due with less king salmon. This proposal would need an a payback component that paid the fish back the following year to work.

Proposal 84: I support this proposal. It is designed to protect the resident angler and one of its suggestions is daily electronic catch reporting from lodges and guides (guides already keep log books). Electronic reporting by lodges, especially those that offer "unguided" bare boat charters, is essential for accurate monitoring of the nonresident, recreational side of the industry. I would like to note that individual guides are already keeping and submitting logbooks I would like to see lodges do the same. I see lodges as small processors. It would be more streamlined if a lodge reported daily or weekly for its fleet. So the lodges are monitored for catch. In order to rebuild the CSOC, there will need to be sampling at lodges so that tags and genetic samples can be collected to truly understand the composition of the catch as is done in the troll fishery.

Proposal 85 and 86: I support these two very similar proposals as they protect the resident angler and speak to the growth in the guided recreational sector.

Proposal. 87: I support the concept of electronic reporting for the component of the recreational non resident and tourist based industry,

in particular lodges, especially those with bare boat charters. The guides are already submitting log books.

Proposal 88: I oppose this proposal for similar reasons to Proposal 83.

Proposal 89: I oppose proposal 89. The proposal provides for trollers that have two power troll permits on board a vessel to be able to fish 6 lines (2 additional) during times when kings may not be retained. This proposal will cause problems with the PST in areas where Canadian bound coho are likely to be in high abundance (Dixon Entrance). The use of additional lines will increase the non-retention encounter rates with king salmon and with that there will be some increased king salmon mortality. This will also cause PST problems. There is a coho sharing plan with the net fisheries in SEAK and the troll fleet is currently catching its allocation and sometimes it is above it's allocation. If Proposal 89 is passed, there could be concern from the net fisheries and a push to have a longer August closure for the troll fishery. Increasing troll efficiency will most likely cause conflicts with other gear groups. Also, this proposal is likely to activate currently dormant permits. ADFG opposes this proposal in their comments. The ADFG comments also provide a table with harvest percentages that display the net groups and troll harvest percentage of coho over the past 30 years. Recently, coho runs have been average or below. There is no reason to increase troll efficiency on coho harvest at the current time. I could see this proposal being passed if the use of 6 lines was limited to designated hatchery Terminal Harvest Areas (THA) or Special Harvest Areas (SHA) for harvesting chum salmon only. These areas tend to be small and congested however. I am not sure how effective that would be. Using 6 lines on the open ocean to harvest cohos will cause many problems and should not be expanded beyond it's current limit.

Proposal 90: I support proposal 90 as it aligns the opening day of the winter troll fishery with the letter of the regulations in the PST. The October 11 opening date does not always include all of statistical week 41. There is a potential here for all user groups to benefit if the CPUE is greater since the Abundance Index that determines the quota is driven by the CPUE in District 13 for Stat weeks 41-48.

Proposal 91: I oppose proposal 91. Changing the percentage of king harvest between the July and August openers is highly allocative within the troll fleet. There really hasn't been a problem with the troll fleet catching the fish in the second opener in recent years. The longer openers generally provide more opportunity for a larger amount of participants. The slower fishing typically leads to a higher quality product. A shorter 2nd opener does not create a problem for me as I can always turn around at a packer and be back out fishing the next day.

Proposal 92: There is already a provision for the retention of 26" kings in hatchery THAs. Am I missing something here. This Proposal won't change anything as far as I can tell.

Proposal 95: I support this Proposal as it effectively advocates for in season management of the recreational fishery.

Proposal 144: I support Proposal 144. This proposal if passed will provide for a timely and more complete set of data to cover the rapidly increasing use of rental boats for nonguided, nonresident anglers that are visiting lodges that don't provide guides on the boats they rent. This is particularly true of lodges that provide bareboat rentals in remote areas like Pelican, Excursion Inlet and Elfin Cove which are highly productive and growing in size but not significantly monitored. The creel sensuous is not very effective in the remote areas and those lodges are growing and so is their harvest. I would like to note that a more efficient way to collect data from lodges, especially in remote locations, and regardless of whether they use guides or bare boat charters, is to have the lodges submit regular production reports like processors. Effectively, they are processors and should be monitored accordingly. This could be achieved with electronic reporting. I support the electronic reporting. I would also like to note that the ADFG comments claim there is no conservation issue, but the fact is ADFG does not know because they do not monitor the activity in of the remote bareboat lodges and they do not take tag or genetic samples from these lodges. I noted this earlier in my preamble when discussing the increased harvest effort in the Cross Sound and Lisianski Inlet areas where trollers have had their hatchery access openers closed to protect CSOC only to have those same areas repopulated by the guided and unguided fishing lodge fleets. Throughout the ADFG comments on modifications to nonresident harvest, there is a lack of acknowledgement of the fact that the bare boat lodges and their fleets are growing.

I will now address some proposals that speak to the management of hatcheries.



Proposal 101 and 103: Proposals 101 and 103: I oppose these two proposals that request an extra management layer be added to the production of hatchery fish. Proposal 101 speaks specifically to the Northern Southeast Aquaculture Association (NSRAA) Crawfish Inlet fisheries. Both proposals ignore the current involvement ADFG has in the permitting, location and management of the hatchery access fisheries in the Terminal and Special Harvest areas through the Regional Planning Team (RPT). ADFG, along with hatchery management and stakeholders are all represented at these meetings. No evidence is presented of the straying issue that is mentioned. I fully support the hatchery programs as an important part of all SEAK fisheries as they provide opportunity for all user and gear groups to harvest salmon, especially if non hatchery salmon or PST salmon are to be avoided in certain situations.

Proposal 96: I support proposal 96 as it provides a little more opportunity for the troll fleet in the Ketchikan area to harvest AK hatchery produced kings. The Ketchikan area has seen some of the most restrictive changes in its spring troll hatchery access openings and this proposal would offer a little relief. ADFG doesn't object.

I offer these comments on Proposal 225. P 225 does not deal with salmon. It is a request for liberalized bag limits on sablefish. I oppose Proposal 225. Proposal 225 seeks to remove the annual bag limit on sablefish for nonresidents. I see removing the annual limit on sablefish as an invitation for excessive harvest that results in either wanton waste or temptation to market the fish outside the State. I keep some sablefish from my commercial harvest for my home pack, between 4 and 6. At some point, the State and ADFG is going to have to acknowledge that promoting unlimited harvest on fully utilized resources is not responsible management. Sport harvesters can shake the little fish. Commercial fisherman are not allowed to. The commercial harvest of sablefish is limited by two different types of permit and quota systems, in both Federal and State waters. We would like to see the nonresident annual limit maintained as most of the clients are hiring guides to catch the sablefish and there is no limit on the vessel number or guide licenses for harvesting sablefish. Maybe their annual limit should fluctuate with abundance. It shouldn't be unlimited though.

Finally, I offer these comments on the ADFG's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. I support option 1, the status quo, for the troll fleet. The areas that would be restricted under options 2 and 3 would close most of the remaining openers that are available for trollers to access Alaska hatchery produced king salmon in any significant numbers since the current policies for the CSOC was implemented in 2018. These openers are in the Sitka area. They are not in the migration corridors of the CSOC. Part of the reason the northern openers have been allowed to continue with restrictions is that there is no significant harvest of the CSOC. There is little opportunity for trollers to fish after March 15 (until July 1) since the CSOC policies were implemented in 2018. The economic harm to the troll fleet would be substantial if the hatchery access openers were to be closed in the Sitka area. There would be no significant gain for the CSOC. This is a time of the year when trollers, like myself are paying maintenance bills and taxes. This is also one of the only times trollers can access AK hatchery produced kings, kings that trollers help pay for with the 3% enhancement tax. Many of these kings were AK hatchery produced, A higher percentage than any other time of the year. If these openers were further restricted, it would certainly beg the question to me, why are trollers paying hatcheries to produce kings they can't catch? Maybe the folks catching those kings should pay for them.

Thank you all for reading these comments. I apologize for the length. I know you all have a lot to read and a lot to think about. There was a lot for me to comment on. Thanks for your patience. I hope you remain healthy.

Sincerely,

James Carter Hughes

FV Astrolabe

Sitka



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Petersburg, Alaska, and I participate in the subsistence and sport salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is a great boon to our community!

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. The fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

Each year, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

Sincerely,

James Stolpe
jdstolpe@hotmail.com

Submitted By
Jamiann Hasselquist
Submitted On
12/21/2021 10:02:27 PM
Affiliation



PC156
1 of 1

I remember as a child my mom would have us kids go down to the beach at Auke Bay where the ferry terminal is located now, to get a bucket of herring. Herring were abundant, we could dig for clams in that area too, but not anymore. The herring on gone from that area, they've been fished out and they continue to be fished out near Sitka.

As Indigenous peoples who have lived off this land for time immemorial we have responsibly harvested. Our ancestors managed our food sources, they never took more than what was needed, they hought of the future, and we were never hungry- until colonization and genocide.

These are not easy conversations to have, nobody wants to learn about how their ancestors of colonialism caused such great harm to other humans in order to gain profit from land and resources or how people today continue to perpetuate the cycle of harm to our communities and resources- resources I feel we as Indigenous peoples have an inherent right too, but we must have these conversations in order to understand how we have arrived to this place of over harvesting for commercial profit, for industrialization.

We must consider the future, for the people who live here, for the health of the ocean for not only Alaska, but the entire world.

Lead with your heart.



Submitted By
Janalee L Gage
Submitted On
11/3/2021 4:45:07 PM
Affiliation
Resident of Alaska and Ketchikan

Phone
9072040635
Email
janaleegage@gmail.com
Address
2512 3rd avenue
Ketchikan, Alaska 99901

Dear Board of Fish,

Now more than ever, it is direr that we protect our Fish, lands, and way of life. Regardless of whether we are Native, we must recognize the importance of Herring to the ecosystem and the devastation to the world if we continue to allow the SAC Roe to destroy our resources for the sake of a dollar bill. You must do the right thing and end these technics that have no consideration or respect for our way of life and our world.

I support Proposals 156, 157, and 158, which lead to safer management of the commercial herring fisheries in Sitka Sound by developing better protecting population resilience. These represent thoughtful and actionable ways to make the current management paradigm less harmful.

As a 6th Generation Alaskan who is a mere 55 years old, I remember being ten years old in Ketchikan and running down the Bar Harbor in Ketchikan and netting Herring. When it was so thick with Herring, one scoop would be hard for my ten-year-old hands to pull up and would yield well over 40 or more herring. I remember the joy when I would run home, and grandma would pickle, fry up, and or smoke these guys.

I am of Norwegian descent, and Herring is a massive part of my heritage, but I haven't eaten Herring in years due to the lack of them in our community. Due to the overfishing of them by commercial Sac Roe. In as little as 45 years, we have seen the devastation firsthand of our Herring, which, if Karma had a say, has reduced our communities' Salmon and other Seafood supplies.

I strongly oppose Proposals 159, 160, 161, 163, 164, and 165, which lack reasonable scientific justifications, disrespects subsistence users and modern and traditional Tlingit Knowledge, and run the risk of further damage and reduction to the herring populations, which would devastate life as we know it in and out of the water.

I believe it is time for The Board of Fish to work with the tribes throughout Alaska because none of these proposals, even those I support, go far enough to protect our resources, land and advance respectful stewardship of our water and land. Since time immemorial, the indigenous people have been stewards of their lands and deserve our respect.

Next, I would request you address the following with the same respect and attention; Ketchikan for years has been considered Urban, per lower 48 or board standards, leaving our Indigenous community members without Subsistence rights.

I fully support 93, 142,146, 147, 148, 170,234.

King salmon is considered a precious resource to all tribal members throughout Alaska. However, these Fish are threatened year after year with low escapement in many of our rivers. Therefore, it is imperative to have in writing to prioritize tribal members to have access to this valuable resource by setting a cap on the annual harvest of king salmon by nonresident sports fishermen regardless of the status of the fishery.

The Board of Fish and the Alaska Department of Fish and Game can still set a limit lower than the established cap by emergency order, but the harvest shall not exceed the cap.



Ooligan Fish is a widely traditional food of the Native community, and this should be honored and protected. I strongly support traditional harvesting of Ooligan by resident use. However, I do not endorse or support commercial harvesting of Ooligan. The Board of Fish should remove all regulations supporting commercial fishing of Ooligan from the fishing regulations.

146 Nonresident harvesting of coho, sockeye, pink, and chum gives a general provision for seasons, bag, possession, annual, and size limits in the Southeast Alaska Area.

Establishing limits for nonresidents to 16 inches or longer, and 5 of each species per day and only 10 of each species in possession for visiting sports fishermen, is a great start. However, it does not go far enough to protect tribal citizens, and Alaska residents who depend on subsistence and personal use in this time of financial instability and a rise in living costs throughout the state. Additionally, with the decrease in seafood abundance due to Sea Lice' devastation to Herring, which in turn has devastated our Coho, Sockeye, Pink, and Chum Salmon, we need to protect Alaskans who are impacted the most.

The Indigenous people of the Ketchikan Indian Community have been using all beach resources throughout southeast Alaska since time immemorial. These include but are not limited to clams, cockles, seaweed, gumboots, sea asparagus, and sea cucumbers. In any indigenous household, you can find a number of these resources at any given time. These resources are part of the identity of traditional users. Therefore, we find it appropriate to have all such beach seafood to be classified as customary and traditional resources.

I also support 234 requiring season reporting by nonresidents as to their fish harvest and believe annual limit status of all species should be a priority. The keeping of these records has been severely mismanaged and is a data deficient in past years. This data is important to the management of future population estimates of our waters fish and seafood abundance and distribution.

We have a responsibility to our community members to make sure that our resources are protected and solvent for generations to come. Over the last 25-35 years the people of Southeast, have fought to protect our land and water from the devastations seen in other parts of the world and lower 48. It is time the board of fish stop ignoring what the Sea Lice fishery has done to other parts of the world.

Populations of Fish are critical to human food security regardless of where you live and in serious decline worldwide. In the last four decades some fish have declined by close to 75%, which in turn impacts other marine mammals such as Whales, seals, otters, birds, reptiles, wolves, bears, eagle, basically all living things. I could go on because the bottom line here is that Herring is the Bees of the Sea, and like their sister the Bee they feed and pollinate our food sources all around us.

We can not become dependent on commercial Grocery stores, and processed foods. If you believe in the idea of freedom, the freedom to live off the land should be our number one protected right.

Respectfully and Sincerely,
Janalee L Minnich Gage



Submitted By
Janessa Newman
Submitted On
12/22/2021 9:57:30 AM
Affiliation

Phone
9073222302
Email
Jnnewman@alaska.edu
Address
9767 front st
Rampart, Alaska 99767

I am writing today **in support of proposals 156, 157, and 158** which would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am **opposed to proposals 159, 160, 161, 163, 164, 165, 166**, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

Further, I believe that none of these proposals goes far enough to advance respectful stewardship and protect the herring for generations to come. Fishing of all kinds is vital to Indigenous well being and mental health.



December 22, 2021

Alaska Department of Fish and Game
Board of Fisheries
PO Box 115526
Juneau, AK 99811

RE: Comments on Southeast Shellfish and Finfish Proposals January 4-15, 2022

Dear Madam Chair Carlson-Van Dort and Board of Fisheries Members,

My name is Jared Bright and I have been fishing in Southeast Alaska for 30 years. I participate in Tanner crab, red king crab, golden king crab, and Dungeness crab fisheries. My boat also fishes for sablefish in Northern and Southern Southeast Inside waters as well as in the federal Individual Fishing Quota fishery. All of the following proposals affect my businesses.

Proposal 195

After reviewing at the King and Tanner Task Force meeting on December 3, 2021, a discussion took place between industry and ADF&G staff. It was agreed that Proposal 195 would include language to insure that it would be closed by April 1st to avoid molting/mating period.

Proposal 197

In 2003/2004 the Department began setting different season lengths for core and non-core areas. Core areas were ones with historically high effort and harvest while non-core zones were given an extended amount of fishing time to allow for exploratory fishing and non-traditional fishing grounds.¹

The core/non-core management style has worked well for the last 18 years. Fishermen 'explored' the non-core areas and have found Tanner crab outside the core areas, but because Southeast is such a large area, many areas and 'sub-areas' remain unexplored. My intent with this proposal was not to oblige the department to assign and describe new exploratory areas by EO before each season, but much like they did in 2003/2004 designate non-core areas that are not receiving any effort as 'exploratory' to allow extra time to explore in these areas. Simply stated, adding a third-tier to the two-tier system.

Proposal 200

¹ ADF&G (Alaska Department of Fish and Game). 2021. Alaska Department of Fish and Game staff comments on regulatory proposals, Committee of the Whole—Groups 1–8 for the Southeast and Yakutat Finfish and Shellfish Alaska Board of Fisheries Meeting, Ketchikan, Alaska, January 4–January 15, 2022. Alaska Department of Fish and Game, Regional Information Report No. 1J21-15, Douglas.



I oppose this proposal. The Klawock ADF&G AC described the area that they wish to close as an 'exceedingly small area' and again as a 'small area'. According to my calculations the area is nine miles long and 4.5 miles wide at its widest point. I would not consider this area 'exceedingly small' or 'small'. It's a very large area that will have an impact on the commercial Dungeness fleet. It is hard to follow the logic of closing a commercially viable area to crabbing around Prince of Whales. This will only contribute to an already depressed economy in the area.

Proposal 201

As a commercial fishermen that has harvested crab in this proposed closed area, I oppose this proposal. There is already a very large Special Use Area around the Sitka Area. From a technical paper from the ADF&G Subsistence division on non-commercial harvest of crab, "mapped information that non-commercial crabbing mostly occurs relatively close to communities, especially in sheltered bays and coves that can be reached in small boats and are protected from severe weather."²

The new area proposed by the Sitka ADF&G AC is 30 miles from Sitka. This will only add to their problem of fuel expense.

Proposal 202

I support Mr. Roddy's proposal. With less than 150 residents the current closed area far exceeds their needs. Leaving the area closer to town closed to commercial fishing seems like a good compromise.

Proposal 203

I support Mr. Roddy's proposal. Closing a bay that has produced 12,877 pounds of crab for a community that harvests 299 pounds seems a bit excessive.

Proposal 205

I oppose this proposal. The East POW ADF&G AC states in their proposal that the commercial fleet would not be impacted by this closure. That is untrue. We are impacted by each and every closure.

Proposal 207

I oppose this proposal. The East POW ADF&G AC states in their proposal that the commercial fleet would not be impacted by this closure. That is untrue. We are impacted by each and every closure.

According to a technical paper from the ADF&G Subsistence division on non-commercial harvest of crab, "while harvesting appears to be a year-round activity in some communities, most

² George G., M. Kookesh, D. Mills, and J. Fall. 1985. *The Non-Commercial Harvest of Crab in Southeast Alaska: A Summary of Available Information*. Alaska Department of Fish and Game, Division of Subsistence, Technical Paper Number 103, Juneau.



harvesting occurs during months with relatively mild weather, from May through October.” The proposed closed area is already closed May, June, July, August, and September; 83% of the milder weather months. This gives sufficient time to harvest the 14.2 pounds per person currently used by residents of Whale Pass before the commercial opening according to RC2.

Proposal 208

I oppose this proposal. First, I would like to address a couple of the claims made by East POW ADF&G AC:

1. ‘The commercial Dungeness fleet would not be impacted by this small closed fishing.’ 93% of all Dungeness crab harvested in District 2 from 2011-2021 came from statistical area 102-60. I participated in the fall Dungeness fishery in area 102-60 in 2020. Over 50% of our crab came from this proposed closure.
2. ‘Supplement the high cost of living and depressed economy on Prince of Whales Island.’ It is hard to follow the logic of closing an area that produces over 50% of the crab caught in statistical area 102-60, the most productive spot in all of district 2. Further depressing the economy of Prince of Whales.

As I noted previously from ADF&G’s Subsistence Division, “while harvesting appears to be a year-round activity in some communities, most harvesting occurs during months with relatively mild weather, from May through October.” The proposed closed area is already closed May, June, July, August, and September; 83% of the milder weather months. This gives sufficient time to harvest the 22.8 pounds (about 10 crab) currently being utilized by the residents of Kasaan, according to RC2, prior to the commercial opening. To further put this in perspective the area proposed for closure produced an average of 31,967 from 2011-2021.³ There are 72 residents of Kasaan using 22.8 pounds of crab each year, that is 1,641.6 pounds annually.

District 2 - Dungeness harvest in past 10 years

(less than three permits fished in red - * CONFIDENTIAL)

| DOL Month | District Number | Whole Weight (sum) 2011 - 2012 | Whole Weight (sum) 2012 - 2013 | Whole Weight (sum) 2013 - 2014 | Whole Weight (sum) 2014 - 2015 | Whole Weight (sum) 2015 - 2016 | Whole Weight (sum) 2016 - 2017 | Whole Weight (sum) 2017 - 2018 | Whole Weight (sum) 2018 - 2019 | Whole Weight (sum) 2019 - 2020 | Whole Weight (sum) 2020 - 2021 | Whole Weight (sum) 2021 - 2022 |
|--------------------|-----------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|
| A - January | 102 | | | | | * | * | | 895 | * | | |
| B - February | 102 | | | | | 4,242 | | | 1,394 | 3,962 | | |
| C - March | 102 | | | | | | | | | | | |
| D - April | 102 | | | | | | | | | | | |
| E - May | 102 | | | | | | | | | | | |
| F - June | 102 | | | | | | | | | | | |
| G - July | 102 | | | | | | | | | | | |
| H - August | 102 | | | | | | | | | | | |
| I - September | 102 | | | | | | | | | | | |
| J - October | 102 | 60,406 | 25,957 | 51,581 | 106,888 | 40,829 | 69,269 | 74,106 | 59,525 | 87,464 | 78,472 | 70,730 |
| K - November | 102 | 12,719 | 12,446 | 31,015 | 19,369 | 5,161 | * | * | 7,676 | 5,126 | 3,754 | 3,858** |
| L - December | 102 | * | * | * | * | 1,982 | * | * | 635 | * | * | * |
| Grand Total | | * | * | * | * | * | * | * | 70,125 | * | * | 74,588** |

**Preliminary harvest through December 15, 2021, Dungeness fishery in District 1, 2, and Section 13-B outside of the SSSUA are open through February 28, 2022.

³ From personal contact with ADF&G



102-60 - Dungeness harvest in past 10 full seasons, plus 2021
(less than three permits fished in red - * CONFIDENTIAL)

| DOL Month | Stat Area | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) | Whole Weight (sum) |
|--------------------|-----------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| | | 2011 - 2012 | 2012 - 2013 | 2013 - 2014 | 2014 - 2015 | 2015 - 2016 | 2016 - 2017 | 2017 - 2018 | 2018 - 2019 | 2019 - 2020 | 2020 - 2021 | 2021 - 2022 |
| A - January | 010260 | | | | * | * | * | | 895 | * | | |
| B - February | 010260 | | | | * | 4,242 | | | 1,394 | 3,962 | | |
| C - March | 010260 | | | | | | | | | | | |
| D - April | 010260 | | | | | | | | | | | |
| E - May | 010260 | | | | | | | | | | | |
| F - June | 010260 | | | | | | | | | | | |
| G - July | 010260 | | | | | | | | | | | |
| H - August | 010260 | | | | | | | | | | | |
| I - September | 010260 | | | | | | | | | | | |
| J - October | 010260 | 60,406 | 25,457 | 49,755 | 101,885 | 31,988 | 69,269 | 72,609 | 59,525 | 87,464 | 74,193 | 70,730 |
| K - November | 010260 | 12,719 | 12,446 | 31,015 | 18,318 | 5,161 | * | | 7,676 | 5,126 | 3,754 | 3,858** |
| L - December | 010260 | * | * | * | * | 1,982 | * | | 635 | * | * | * |
| Grand Total | | * | * | * | * | * | * | 72,609 | 70,125 | * | * | 74,588** |

**Preliminary harvest through December 15, 2021, Dungeness fishery in District 1, 2, and Section 13-B outside of the SSSUA are open through February 28, 2022.

Proposal 214

I oppose this proposal. As much as I appreciate clarity, I do not believe this is a good proposal. I currently fish 300 round Dungeness pots, but believe that the door for innovation should always be left open. Changing the language from diameter to perimeter would accomplish the same clarity without stifling innovation.

5 years ago no one had ever heard of a 'slinky' pot. 'Slinky' pots completely revolutionized the sablefish industry. If blackcod pots had been defined as 'rigid' that would not have happened.

Proposal 220

I support this proposal. Pots are a much more sustainable, cost effective way to harvest sablefish.

Proposal 221

I do not support this proposal as written. I understand the Department did a short, sample size study on escape ring size effect on fish harvested. My boat has hauled thousands of sablefish pots (both rigid and slinky) and I have sold thousands more to 50 different customers.

After our initial experience with small fish we started ordering pots with 12 escape rings. These have eight 90cm (3.5") and four 80cm (3.1") escape rings each. That was how we sold our first 6,000 slinky pots. After feedback from my own boat and input from many of our customers we have changed to eight 80cm (3.1") escape rings for the last 4,000 pots.

It is amazing how big of a black cod can squeeze out of a little hole. We fishermen get paid significantly more for larger fish. We don't want to catch small fish, but we also don't want to lose big fish out of our pots.



Eight 80cm (3.1") escape rings will let out the smaller fish and retain the market size fish better than two 3.75". The department support pots, which have shown to catch less bycatch and prevent whale predation. Less people will use pots if required to use oversized escape rings and they will continue to catch and retain fish off all sized with hooks.

Proposal 232

I support this proposal. The department may not have a stock assessment for spiny dogfish, but as a year round Southeast fisherman, I can tell you they are at a very high abundance currently. This year all the salmon seiners in Clarence Strait struggled to avoid the large school of spiny dogfish. I personally had a set of an estimated 40,000 pounds of spiny dogfish. I had to let the end of my net go and lost any salmon I may have had in there. At the very least, I would like to see a plan for a stock assessment of spiny dogfish, if the department believes one is necessary to open a fishery.

Thank you for considering my comments.

Sincerely,

Jared Bright
F/V Obsession
ADF&G KTTF Co-Chair
Slinky Pot Inc

A handwritten signature in black ink, appearing to read "Jared Bright".



Submitted By
Jared Jillie
Submitted On
12/17/2021 7:22:01 AM
Affiliation

Phone
9072206449

Email
jilliem@msn.com

Address
P.O. Box 5933
Ketchikan, Alaska 99901

I, Jared Jillie, current troll permit holder strongly oppose measure 83.



Submitted By
Jared Jillie
Submitted On
12/17/2021 7:45:23 AM
Affiliation

Phone
9072206449

Email
jilliem@msn.com

Address
P.O. Box 5933
Ketchikan, Alaska 99901

I, Jared Jillie, current power troll permit holder strongly oppose measure 89. Please don't allow permit stacking. Traditional trollers (smaller non-freezer boats) already have to compete with the larger vessels. Being that there is no vessel size/length limit the larger boats already have an advantage being able to fish in rougher water. These larger boats are taking a bigger percentage of the quota as is. Please keep it a level playing feild. Most of the support for this measure is from large freezer boat owners. I am also concerned that this will increase the cost of permits making it even harder for young fisherman to get a permit. Thank you.

Submitted By
Jason Baldwin
Submitted On
12/22/2021 7:03:32 AM
Affiliation



PC161
1 of 1

The state cannot go far enough to protect the natural resources of Alaska. The true value of Alaska is in its untouched resources. Not for further use but for their innate value.

Submitted By
Jaycen Andersen
Submitted On
12/21/2021 10:38:19 AM
Affiliation

Phone
(907)738-0706
Email
cinnabarfisheries@outlook.com
Address
P.O. Box 99
Sitka, Alaska 99835

Comments on Board of Fish Proposals

Madam Chair Märit Carlson-Van Dort and members of the Alaska State Board of Fisheries:

My name is Jaycen Andersen. Owner of the F/V Toni Marie. Fourth generation fisherman, father and local Alaskan. I want to thank you for the opportunity to comment on the proposals submitted before you. Merry Christmas and many blessings moving forward.

Proposal 80- Support

Please, start the discussion. I want to see individual gear groups held accountable for their own overages. Might want to more closely monitor sport harvest from remote lodges. And the ever growing non guided sector. You'll hear that reminder a couple times through out;

Proposal 82-Support

I support 82 with the two amendments suggested by the Sitka Advisory committee that protect access for resident sport anglers. Specifically, to apply resident priority as a management objective at all levels of abundance. 5 AAC 47. 055 (b)(6) *if the department projects that the king salmon sport harvest allocation is going to be exceeded, the department shall, by emergency order, adjust the nonresident seasons and bag limits so that there are no closures for residents.*

And to delete the proposed July 1- July 31 resident closure that would apply to years when the CPUE is 2.6-3.8 out of 5 AAC 47 .055(g)(2)

Under this proposal, I support a plan where sport bag limits will be set by the Commissioner at the beginning of the season based on that years sport allocation adjusted for any prior underage/overage.

Proposal 83- Strongly oppose

Flawed. Unrestricted growth in the guided and non guided sport sector. Without limited entry for the guided sport sector and non guided sector, the 80/20 will never be achieved without flexible bag/annual limits. The numbers today aren't like the ones referenced in previous management. The authors of this bill had representatives for the recreational sector when it all went down. They are well aware that the latest PST agreement requires that all user groups make due with less. I'm already giving them more than their deserved share of my hatchery kings. They pay nothing into the production of our hatchery produced salmon, yet get to benefit from them financially. For them to ask more now; especially with the stocks of concern being an issue also, is strictly greed based. The assumption that there will be an equal amount of high abundance years verse low abundance years is also bs.

Proposal 84- Support

I support resident sport fishermen over nonresident. Also in full support of requiring daily electronic catch reporting. All the trollers numbers are accounted for at the dock. No arguing the numbers. With the ever growing number of non guided anglers this is extremely important to the management of our King Salmon and to hold user groups accountable.

Proposal 85- Support

Again, residents first.

Proposal 88- Oppose

Oppose for similar reason to 83. Both of these proposals would lead to unjustified reallocation of king salmon.

Proposal 96- Support

Trollers pay for them, shouldn't one get a whack at them?

Proposals 101 & 103- Strongly oppose

Lack of evidence in straying numbers. Like as in none. I fully support our hatchery programs here in Southeast Alaska that keep our communities alive and our hatches full.

Proposal 115- Oppose.

Personal reason for me. More opportunity for me and my fishing schedule to leave it as be.

Proposal 117- Support

Facts are facts. Give them their 2 extra lines, I wanna watch. (If you're concerned those couple extra lines are going to send them over their allocation, you can sleep easy knowing it won't do that much damage)

Proposal 144- Support

Keep these guys honest. With an ever growing non guided sport sector, it is critical that we manage them and treat them the same as we would the guided sector. You can't try and manage a resource if you're not managing the fleet.

Proposals 171,172, & 173- Strongly Oppose

Let me get this straight. The short, quota based, with strict in season management is to blame for this supposed stock decrease? Because of harvest by the commercial sector during a time when the females are bearing eggs? I'm not buying it. Shrimp run in cycles. Historically speaking, I see no reason of concern that makes me want to switch up the season. Shrimp can be a lucrative opportunity, so conservation is priority. I think the sponsors have great intentions, but aren't recognizing the larger threat to the shrimp. Take a look at the growing number of sport guys coming up and spending all summer shipping friends in and out, constantly fishing. No accountability. Sport lodges with shrimp gear out all summer long to feed their clients. Floating lodges harvesting, Resident sport guys filling freezers with unlimited amounts until recent changes. Ocean changes and Unregulated growth in so many areas and some want to point the finger at a quota based harvest by the commercial sector? How ignorant or biased could one be? Or is it a few who would rather it be for personal business decisions other than actual concern for the stocks?(e.g. would rather fish in spring than fall) I have other fisheries I could personally move around to accommodate, would it be an inconvenience? Hell yeah, but that's not why I'm arguing against. Reasons. It wouldn't matter if we caught that shrimp before it spawned 5 months prior. It's still dead and not going to spawn again anyways. The quality won't begin to compete as they've just gone through a molt at this time and shells are much softer. More opportunity for freezer burn. Since all the eggs are now gone, guess what?! So is the weight. They'd be stupid to think ADF&G are going to give us the same weight allowance. A lot of these areas that are shrimping grounds also have spring troll fisheries occurring. Nothing more a troller loves than buoys! My main argument against is because none of these sponsors to the various closers and season change proposals; have acknowledged any other factors or acknowledge the reasons why one wouldn't have a spring shrimp fishery(over fishing in certain areas of sport/subsistence/personal use or reasons stated above) Making this change to the season dates would be as experimental as the mRNA vaccine.

I've included my replies to the additional benefits that the Sitka advisory committee and another had included.



- 1 Enhanced management of the fishery.... -Change the survey time if that's the concern. I'm involved in many fisheries and in my opinion, not many of them get the scrutiny and on the fishing grounds management that the shrimp fishery (ADF&G on that one. I'd be interested to hear their take on this.
2. More opportunity for local market- local markets get what they want. And only so much shrimp can be consumed fresh, so its frozen anyways. Actually, end of year sales are probably your highest. All the major holidays are after our fall fishery. Local/domestic or otherwise, it shouldn't matter if we're arguing for stocks of concern. Getting rid of Alaskan Spot Prawns is not an issue.
3. Safer weather and more participation opportunity for smaller boats- Weak argument since the vast majority is caught on inside waters. Might as well only permit certain weather conditions in order to participate in all fisheries! I love the flat calm. Or could this be the argument that the crabbers are making because they'd like to have an open schedule to fish.
4. A more viable product for US markets... - That itself is a marketing issue, not board of fish issue. I can find people to argue that they love and prefer a shrimp with the roe.

Proposal 174-Strongly oppose

Again, many variables. I'm tiring of hearing about BC's remarkable sustainable shrimp fishery. Show me the numbers. My talks with BC fishermen, buyers/processors tell me differently. "As British Columbia has proven, shrimp stocks remain sustainable only if the egg bearing females are allowed to release their eggs prior to an open commercial fishing season" One of the most idiotic statements I've read within these proposals. "ONLY if the egg bearing...?!!" That's a pretty strong statement. Only. What kind of nonsense is that? I could go and kill the run in the spring when they're spawned out. Eggs or not, they dead. Greater factors are not being considered and I ask these sponsors to recognize this. All the written arguments for proposals 171-174 are flawed at best. No data to back these claims. There are 2 things we do know. Constant changing ocean conditions and fish have tails, and use them. The sponsor of this proposal also claims "when asked, a large percentage of the commercial shrimp fishermen support a spring shrimp fishery in Alaska. I was never asked this question. Was there a survey I missed? I do not support.

Proposal 175- Strongly oppose.

It doesn't matter what configuration my gear is in. It's going off fast. We're only allowed so much time to fish. By trying to limit fishermen to 10 pot strings, all it will do is make a guy take up more real estate and more buoys for entanglement issues. I don't see how it will slow the pace or how it would provide gear standardization between large and small vessels. Like I said, you name the configuration and I'll still set my gear just as fast.

Proposal 176-Strongly oppose

Again, I see nothing. [REDACTED] states its turned into a derby. False. It's a quota based management fishery. Reducing the number of pots isn't going to change the outcome. 1000lbs is still 1000lbs, whether it comes up in 1 pot or 100 pots. I feel a small boat bias going on here. He states it would reduce the daily catch. The only thing I can agree with. And how that would make any difference for fishery managers determining catch day to day is beyond my pay grade. The math provided does nothing for me either. Not following

Proposals 177,178,179- Strongly Oppose.

Am I the only one the see's the personal use/sport bias within these proposals surrounding POW?(all shrimp proposals for that matter) Close the quota based commercial fishery so we can have an unlimited whack at the resource till it's gone! That's what I'm hearing.

Proposal 217- Support

More opportunity for trollers to make an extra buck off bycatch. Like my grandfather would say, "Just as easy to put 2 bits on board as it is to shake it." Easier actually, Gramps. Numbers show that in 16 years, only 79lbs of lingcod was landed on a Jig card. Not a sustainable lifestyle!

Proposal 219-Support

Reduces rockfish waste. All in the name of conservation.

Proposal 224- Support

Why not allow for personal use only? There's a lot of joy in jigging up a rockfish, and a lot more when you get to take it home and put it on your plate.

Proposal 225- Oppose

Again, until one controls the unlimited growth, rape, and pillage of the non-guided and guided anglers, I don't have time for more wants. I wanna, gimme gimme. All for the electronic reporting though. Keep 'em honest.

Proposal 227- Strong feelings

Proposal 230- Support

As stated the number of resident anglers in southeast has been stable and isn't showing any signs of great increases. Give the residents an opportunity to feed their families in these ever-changing times with increased prices in protein-based foods especially. If stock numbers allow, I say let them eat.

Proposal 241-

How would one enforce an amount if the definition was shrimp as a whole, since most discard heads and only retain tails? "Currently the limits are set on "Shrimp" and the undefined term is being mistaken as meaning a shrimp tail." How can it be mistaken if there isn't a definition?? I would ask the department for their definition.

Proposal 276- Support

It's ridiculous that I can't have a fish onboard to consume that comes up dead on the hook. Yes, mortality is a fact and it's a shame to let it go to waste when it could feed my crew and I. Did I mention my crew, my family. I could feed my family the greatest source of clean protein and vitamins, instead it goes to waste. Please adopt this. Hell, it's easier than an app. Just record them on the back of our sport license like I would if I was in my skiff. We can report at the end of year if needed.

In closing, I'd like to comment on ADF&G's RC 6, Northern Southeast Alaska King Salmon Stock Status and Action Plan, 2021. I support option A, the status quo, for the troll fleet. The areas that would be restricted under the Increased Management Options would close most of the areas that remain available for trollers to access Alaska Hatchery produced King Salmon. Not the SOC.

There has been very limited opportunity for trollers, like myself, to fish between March 15 and July 1 since the SOC policies implemented in 2018. There would be no significant gain for the SOC if the Sitka area was closed to hatchery openers who have a chance at getting our money back out of our paid for and produced King Salmon.



Thank you for reading. Blessings,

Jaycen Andersen

F/V Toni Marie

Submitted By
Jaycen Andersen
Submitted On
12/22/2021 10:37:10 AM
Affiliation

Phone
9077380706
Email
Cinnabarfisheries@outlook.com
Address
P.O. Box 99
Sitka, Alaska 99835

madam chair and board,

Apologies for the confusion. On my first set of comments I stated on prop 82 that I support and under the comments added that I only support it with two amendments. Just wanted to make clear that it was supported with amendment only. Thank you and forgives me,

Proposal 82-SUPPORT WITH AMENDMENTS

I support 82 with the two amendments suggested by the Sitka Advisory committee that protect access for resident sport anglers. Specifically, to apply resident priority as a management objective at all levels of abundance. 5 AAC 47.055 (b)(6) *if the department projects that the king salmon sport harvest allocation is going to be exceeded, the department shall, by emergency order, adjust the nonresident seasons and bag limits so that there are no closures for residents.*

And to delete the proposed [July 1- July 31](#) resident closure that would apply to years when the CPUE is [2.6-3.8](#) out of 5 AAC 47.055(g)(2)

Under this proposal, I support a plan where sport bag limits will be set by the Commissioner at the beginning of the season based on that years sport allocation adjusted for any prior underage/overage.

Submitted By
Jed Delong
Submitted On
12/22/2021 7:09:06 PM
Affiliation



PC163
1 of 1

Herring in Sitka sound appears to be overfished. This has happened in countless other herring fisheries around the state, other areas in the US and probably elsewhere. ADFG is constantly touting what great management we have, yet nearly all of our fisheries, from king salmon, to halibut, to black cod, rockfish, and of course herring are not nearly what they were when I was a child 25 years ago. I'm tired of seeing conflicts of interest in state management positions, fish surveys, and lobbyists. Subsistence needs and residents seeking to fill their freezers should trump all commercial interests, including out of state "sport" fishing (charters). Herring is the bottom of the food chain, although it is not, to my knowledge, managed as a forage fish. I strongly oppose the sac row fishery. It is a bunch of wealthy fishermen profiting off of a public resource and decimating it.

I grew up snowboarding in Sitka, and spring is usually the best. We could always see the huge plumes of spawn around Sitka sound from the mountains. However, there is now little if any visible spawn during the herring season. I'm tired of fisheries management being a political entity that simply bends to the whims of the moneyed. Please take the courage to stand up to the money and use conservative scientific management practices. We won't get another chance if you blow it. Thank you, Jed



Submitted By
Jeff Farvour
Submitted On
12/22/2021 5:40:27 PM
Affiliation

Phone
9077380898
Email
jefarv@gmail.com
Address
439 Verstovia Ave
Sitka, Alaska 99835

December, 22nd, 2021

Comments on proposals 82, 83 and 117

Dear Members of the Board,

My name is Jeff Farvour, I am the author of Proposal 117. I fish for food and livelihood out of my community of Sitka with salmon trolling as my primary (and nearly sole) source of income.

Comments starting in reverse order:

Proposal 117- **SUPPORT**

While I clearly and strongly support this practical proposal and agree with ADFG staff comments, the below two points are to clarify that in fact, the intent of proposal 117 is to:

1. **Prohibit the retention of king and coho when vessels are utilizing the proposed provisions of this proposal (running two extra lines) while commercial chum trolling in these three chum areas, and**
2. **All provisions and restrictions would apply to both commercial power and commercial hand troll.**

Regarding #1 above, the potential concern that this provision may present undue enforcement concerns could easily be alleviated by the fact that cohos and especially kings harvest is relatively de minimis in these areas. If additional marking of the vessel using this proposed provision, or other practical options, would help alleviate any additional enforcement concerns then those may be a reasonable contribution as well.

Also, as opposed to many proposals the Board will be entertaining at this meeting, please consider the following. As far as can I am able to determine:

- There are no treaty issues with this proposal
- There are no conservation issues with this proposal
- There are no consolidation issues with this proposal
- Utilization of this provision is an option- not a requirement. For some it will work, for others it may not, just as trolling deep for kings or running two extra lines at the fairweather grounds
- Because of our gear limitations, trollers are chronically under our allocation of enhanced fish. There are very few other viable tools available to the troll fleet to help achieve greater efficiency and success in harvesting our allocation

Proposal 83- **Strongly OPPOSE**

Reasons to strongly oppose to this reallocation proposal are lengthy for this fully subscribed species. Amongst them are:

- It's a flat out reallocation in times of lower abundance
- Its likely that we will be in a lower abundance scenario for the foreseeable future
- This proposal is especially damaging under low abundance when everyone is suffering except that trollers would suffer more
- It would set the precedent that under times of lower abundance that the charter sector is prioritized over commercial trolling
- 86% of commercial troll permits are owned by SE residents
- There are troll permits residing in nearly every, if not all, SE communities
- The charter sector does not "need" anything except to control their industries impacts on other sectors
- The proposal invites the same community outrage and offense as other charter reallocation proposals such as past halibut issues
- The Wild Fish Conservancy lawsuit seems likely to change things for the worse, even in the best of scenarios

Proposal 82- **Support with amendments**

I support this proposal conditional on the adoption of the 2 amendments proposed by the Sitka AC.



PC164
2 of 2

Sincerely, Jeff Farvour

F/V Apollo

Sitka, AK



Submitted By
Jeff Wedekind
Submitted On
12/22/2021 3:01:52 PM
Affiliation
Chinook Shores, Inc.

Phone
9076174850
Email
chinookshores@gmail.com
Address
25 Potter Road
Ketchikan, Alaska 99901

Chair Carlson-Van Dort and members of the board,

My name is Jeff Wedekind, I came to Alaska in 1979 to go fishing and never left. I've fished on seiners, long liners and crabbers from Ketchikan to the Bering Sea. My family owns Chinook Shores Lodge located in Ketchikan. We built the lodge in 2005 and have been operating successfully for 16 years. We have 6 seasonal employees, 3 full time employees and hire multiple local contractors, fishing guides, mechanics, and professional services. We accommodate 30 guests and operate nine rental boats and own one charter boat with a CHP.

Sport fishing is our sole source of income and we spend most of that revenue in our local town. We purchase a lot of groceries, hardware, building materials, marine engines, fishing tackle and we pay a lot of local sales and property taxes. Our guests will often times spend a few extra days in Ketchikan staying at hotels or B&B's and dine out at the local restaurants. It's fair to say that our business and similar operations pump a lot of dollars into our local economy.

King salmon fishing is a major attractant to Alaska, and during the month of June and early July, it is often the only salmon available. Having stable, reliable fishing opportunities for our guests is critical to our business. We are not commercial fishermen who are able to take advantage of additional harvest in times of high abundance, and because we market opportunity, we cannot afford to have our season completely shut down in times of low abundance.

I support Proposal 83, which avoids in-season management and keeps some level of opportunity for sport anglers during times of low abundance while the commercial trollers take advantage of additional harvest in times of high abundance to achieve an average 80/20 split between trollers and sport anglers. This also benefits resident anglers as well as nonresident.

I do not support Proposal 82, which has the ability for in season management for sport anglers and can effectively shut down the fishery. Lost opportunity for king salmon means losing guests at our fishing lodges.

I do not support Proposals 144, 145, and 277. A log book program for rental vessels is not an efficient method to capture catch data. Isolating just one sport sector only gives a small window into the harvest of the sport fisheries. I agree that there has been an increase in rental boats, however, there has also been a huge increase in personal use boats in saltwater fisheries. I would support a fish ticket program that all sport and personal use anglers filled out and turned into the ADFG via paper ticket, log book or electronic application. Singling out only one sector of the sport fishery because they rent a boat seems to aim more at attacking a business model rather than collecting harvest data to effectively manage a fishery.

Proposal 277 is the same proposal that was rejected at the 2019 NPFMC meeting in Anchorage. I do not understand why this proposal is up for consideration at the BOF meeting as halibut bag limits are not regulated by the state.

This proposal discriminates against residents that can't afford to own a boat and it discriminates against non-residents accessing a federally managed fish. It penalizes anglers for renting a boat without the benefit of having a USCG Captain/guide on board or the ability to safely fish in the same waters that many of the guides access. Also, anglers renting boats don't have access to GAF halibut like CHP holders do.

Proposal 277 is an unsubstantiated attack on a business model that has been around for 70 years. If we are going to realign bag limits, then we need to bring everyone into the CSP and realign bag limits of all sport anglers. There is nothing to gain by fractioning off another subsector of the sport fleet based on perception.



Submitted By
Jeff Wolfe
Submitted On
12/15/2021 7:04:49 PM
Affiliation

Phone
9077386300
Email
jeffwolfeman@hotmail.com
Address
118 Erler st
Sitka, Alaska 99835

To: State Board of Fish and Game

My name is Jeff Wolfe. I am an Alaska native, born and raised in Sitka, Alaska where I still currently live and commercial fish and crab. I strongly **Oppose Proposal 201**, along with all the other Dungeness crab closure proposals. (205,207,208,210).

I oppose this because the commercial Dungeness crab fishery is very important to this region. There are lots of permit holders, deckhands and a huge shoreside element that employ a considerable amount of people involved in crab processing. There are also a number of crabbers that sell their crab caught in this area off the dock to the residents of Sitka, many whom don't have their own boats or gear to go harvest crab themselves. All these people that depend on this accessible resource would be impacted in a negative way. With every single area that is closed to commercial crabbing, it becomes near impossible to meet the threshold required under the current crab management plan to have a complete crab season.

I have been commercial crabbing in this area for the past 13 years with two deckhands. Additionally, there are numerous other crabbers sharing these waters. This area has been historically utilized by commercial crabbers for the past 35 plus years, with commercial crabbers fishing alongside the few sport and subsistence crabbers who choose to travel the 25-40 miles to get to these fishing grounds.

This is an imperative area to new fisherman entering the fishery. It is the closest area to Sitka that can be commercial crabbled. There are already huge areas that are closed to commercial crabbing all around Sitka but remain open to sport and subsistence crabbers so they do not have to incur the huge expense of traveling 25 plus miles away to catch some crab.

Oppose Proposal 201; keeping this area open to all user groups that have traditionally crabbled in the area is the best policy.



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I participate in the commercial salmon fisheries of the Southeast region.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. The fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any



reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Jeffrey Golden
justgoldj1@aol.com
(360) 201-5479



Submitted By
Jeffrey Short
Submitted On
12/22/2021 1:20:21 PM
Affiliation
JWS Consulting LLC

Phone
9072093321
Email
jwsosc@gmail.com
Address
19315 Glacier Hwy
Juneau, Alaska 99801-8202

Dear Board of Fisheries,

I am an environmental research scientist holding a M.S. in physical chemistry and a Ph.D. in fisheries science, and I have lived on the shoreline of Tee Harbor, just north of Juneau, Alaska, for more than 40 years. During this time I have watched the Lynn Canal herring stock, once one of the three strongest stocks in all of southeast Alaska, dwindle to almost nothing. Having published on the importance of clupeid forage fish in neritic food webs in the peer-reviewed scientific literature, I have a keen appreciation for the crucial role these species so often play. In particular, I believe that a moratorium on commercial fishing for herring in southeast Alaska would promote recovery of the severely depleted stocks beyond the Sitka stock, and could lead to a much more productive marine ecosystem that would provide considerably greater benefits to all stakeholders and rights-holders once these other stocks have fully recovered.

Alaska's constitution requires sustainable management of the state's fish and game resources. The relentless decline of southeastern Alaska's herring stocks under state management is clearly inconsistent with this mandate. Continuing to authorize a commercial fishery on the Sitka stock, the last remaining strong stock in southeast Alaska and thus the last large source of recruitment for rebuilding the seriously depleted stocks elsewhere in southeast Alaska, is unconscionable. In light of this, I ask in the strongest possible terms that the Board adopt herring proposals 156, 157 and 158, and reject proposals 159, 160, 161, 163, 164, 165 and 166.

Thank you for this opportunity to comment,

Jeffrey Short, Ph.D.



Submitted By
jerry foster
Submitted On
11/2/2021 12:34:22 PM
Affiliation

Phone
9072526206

Email
jerry_geri@hotmail.com

Address
36238 Bradford Rd. PO Box 1147
Sterling, Alaska 99672

I went halibut fishing out of Homer this summer on a "charter-free" Wednesday and there were charter boats (binoculars) anchored in the first two spots I usually stop, so I moved on until we were clear of any other fishers.

As I reflect on the new "fishing quote" program from my point of view it seems like a clever reallocation of halibut from sport to charter operators who are clearly commercial fishers. Sport fishers are not a cohesive political lobbying group and I suspect their views were not represented in whatever process was used.

When I fish halibut in the Juneau area I've seen small structures "plugged" with charters - given the more limited number of fish, this is a problem.

I wanted to voice my displeasure with this program and although the feds manage the halibut fisheries, Alaska also plays an important role.

Submitted By
Jesse Hughey
Submitted On
12/21/2021 8:12:51 PM
Affiliation

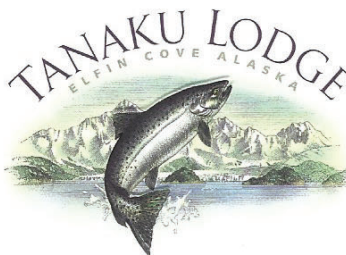


PC170
1 of 1

I am writing today in support of proposals 156, 157 and 158 which would lead to safer management of the commercial herring fishery in Sitka Sound by protecting population resilience while doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165 and 166, which lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

I also believe that none of these proposals goes far enough to advance respectful stewardship ensure the existence of herring for generations to come. If current practices continue it is only a matter of time before overharvesting destroys this vital resource.



Marit Carlson Van Dort, Chairman
Alaska Board of Fisheries
1255 W. 8th Street
Juneau, AK 99811-5526

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

My name is Jim Benton and I own Tanaku Lodge in Elfin Cove. We are a family run business that employs a staff of 16 and contributes to the economies of Elfin Cove and Juneau. We have operated for 27 years and king salmon has always been an opportunity for our customers. King salmon are critical to my operation all season, and especially early. Kings are one of just a few fish that really attract anglers to come to Alaska.

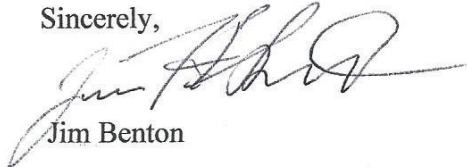
I do not support Proposal 82. I'm concerned about the loss of opportunity for non-residents to keep kings in low abundance under this proposal. Our customers typically book a year in advance. It can be extremely difficult for our business to explain that we do not know what king salmon regulations will look like.

I support Proposal 83 that keeps workable regulations in low abundance and avoids inseason management. Proposal 83 would provide our customers with more certainty year over year. Managing for an average 80/20 split with the commercial sector has worked in the past.

At Tanaku Lodge we want to provide our customers with an overall Alaskan experience. We do not need hefty limits during times of high abundance. We believe resident fishermen should have opportunity to catch plenty of food and non-residents should experience catching a king salmon. Proposal 83 will do this.

I hope the Board can find a fair tradeoff between all user groups. Regulations that keep the king salmon fishery open all season will benefit all fishermen and our local economies.

Sincerely,



Jim Benton

Tanaku Lodge, LLC
P.O. Box 74
Elfin Cove, AK 99825
800.482.6258
907.239.2205 907.239.2253
www.tanakulodge.com
tanaku@msn.com

Submitted By
Jim Bleil
Submitted On
12/20/2021 9:15:20 PM
Affiliation



PC172
1 of 1

I support proposals 156,157, and 158, to better manage the sac roe herring fishery. I am opposed to proposals 159,160,161,163,165, and 166. The herring are the most important bedrock species in Sitka Sound. They support our salmon, our eagles, our bears, our whales, and our trees. Proposals 159,160,161,163,165, and 166 fly in the face of good scientific fact and indigenous knowledge. We need to respect this place and help to keep it as special and wonderful as it is. Decimating one of the most important cornerstone species does a disservice to us all as southeast alaskans. The sac roe fishery is wasteful and short sighted and shameful. Please respect the home we all share. Did you know David Attenborough singled out and bashed the southeast sac-roe herring fishery in the BBC series Our Planet as an example of a wasteful and unsustainable fishery? This was one of the most well funded and widely veiwed naturalist progams that has ever aired. The episode was called "Costal Seas". They had the whole planet to chose from and they chose our Sac-Roe fishery as an example of "A sad tale of unsustainable fishing that has been told time and time again." This is an embarrassment and worth thinking about. We need to do better than this. Thank you.



Submitted By
joan mcbeen
Submitted On
12/17/2021 9:00:02 AM
Affiliation

Phone
9077362245

Email
joanmcbeen@yahoo.com

Address
po box 23
tenakee springs, Alaska 99841

I support herring proposals 156, 157, 158 and oppose proposals 159, 160, 161, 163, 165, 166. When I moved to Tenakee Springs 45 years ago, I harvested herring eggs around town. After many years of commercial herring fishing and subsequent collapse of herring population, I don't see any roe. Herring feed the salmon we depend on for our subsistence life and must be protected.

Thank you for this opportunity to comment.

JoanMcBeen

Tenakee Springs, AK



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

Support Proposal 166 and 233. Allow existing Sitka sac roe herring seine permit holders to utilize open pound roe on kelp as an alternative to seining and remove the Sitka area from the Northern Southeast roe on kelp administrative area.

Dear Chairwoman Carlson – Van Dort and Board of Fisheries Members,

Changes in the Sitka sac roe fishery should have been made many years ago. The Board of Fisheries has shown support for this proposal in the past but has been unable to act due to existing CFEC regulations.

The Board of Fisheries demonstrated support by writing a letter to CFEC requesting exclusion of Sitka Sound from the administrative area of the Northern Southeast herring spawn on kelp area.

CFEC held a hearing Nov. 6, 2015.

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

Why was this allowed to happen? The Board of Fisheries has the power to control methods and means of how fisheries take place.

In the minutes of the CFEC hearing which were subsequently provided to the Board, CFEC stated to the hearing participants that the hearing not be about Proposal 126 (the proposal for the Board during that year’s cycle).¹ Because of this reasoning the supporters of the proposal did not send the CFEC any information on the proposal nor did we feel any pressure to fight for our proposal because CFEC stated it was not going to consider it in the reasoning behind determining the area change. Testimony at the hearing proceeded and, as Mr. Twomley explains in his letter of January 8, 2016 to the Board of Fisheries, “Virtually all of the public comment and testimony concerns Proposal 126 and, with the exception of those of its proponent Mr. Kapp, all comments were in opposition to adoption of Proposal 126, mostly because of the potential negative economic effects on the existing pound fishery and its permit holders.”²

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

We believe the CFEC overlapping the areas was arbitrary and caprices. Mr. Twomley states “And we went back to our records, asked our staff to search through what we had, and we could not find a stated

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

² Twomley letter to Board of Fisheries, January 8, 2016

³ CFEC Sitka Sound hearing Bruce Twomley: page 3



reason for doing that.”⁴ Commissioner Carl Rosier memorandum “The Commissioner made clear the department’s preference for either two large administrative areas (Northern and Southern) covering all of Southeast Alaska, or two smaller administrative areas that would encompass Hoonah Sound and Craig/Klawock”⁵ The CFEC chose the larger area.

We had the impression the CFEC hearing would be about the area definitions and why the overlap. Some of the concerns of the overlap should have been addressed but were not:

1. The Sitka sac roe seine fishery was first be given limited fishery. The Northern Southeast herring spawn on kelp fishery was years later. Was it right to overlap the areas? Mr. Twomley states “And so we had to acknowledge that our current definition of Northern spawn-on-kelp may not have fully complied with our statute.”⁶
2. Do the areas defined represent the actual fisheries taking place?
3. Would the overlap of the GO1A area with the L21A area, years after the GO1A area was a limited entry fishery, add more users to GO1A an already fully utilized stock of herring?
4. Why would CFEC, intentionally or not, add more effort to the fully utilized Sitka herring stock?
5. Was it a mistake to add the potential of more users to the Sitka limited entry stock?
6. Herring stocks, in Alaska, are managed by the spawning area of that particular stock. Why would CFEC consider L21A, herring stock users also accessing GO1A herring stocks?

Myself and many other G01A permit holders feel the Board should support the proposal allowing existing Sitka Seine permit holders the opportunity to harvest their share of the herring resource with open pounds instead of purse seine. CFEC states “If however, the Board of Fisheries decides to go forward with Proposal 126 (the proposal number at the time) or something like it, we would reconsider the matter and examine whether allowing the Southeast roe herring seine permit holders to participate as pound fishermen would be consistent with the Limited Entry Act.”⁷ We are not asking the Board of Fisheries to allow more effort into the Sitka roe herring fishery. We are asking the Board to allow those already in the fishery to use a different method to harvest their share of the herring resource. The Sitka sac roe fishery has needed to change for many years and likely would have if not for this arbitrary administrative area overlap. Please do what you can to correct this situation which would allow the Sitka fishery to improve and provide more benefit to the community and all participants involved.

Best regards,

Joe Lindholm

G01A Permit Holder

⁴ CFEC Sitka Sound hearing Bruce Twomley: page 3, p3

⁵ Twomley letter to Board of Fisheries, January 8,2016

⁶ CFEC Sitka Sound hearing Bruce Twomley: page 3, p4

⁷ Twomley letter to Board of Fisheries, January 8,2016



Submitted By
Joe Willis
Submitted On
12/18/2021 8:44:45 AM
Affiliation

Phone
(907)518-4652
Email
willisjen@gci.net
Address
PO Box 43
Petersburg, Alaska 99833

Proposal 198

I'd like to thank the Board for reading the RC's and giving us opportunity to clarify on why we've submitted a proposed regulation change. I submitted this proposal to help address some concerns I have and make it a more safe & profitable fishery. My beautiful wife and I became vested in the fishery with a K49 card in 2012. We fish the permit on our 46' Delta/LeClerq shallow draft pocket seiner called the Sakina. These are a few of the more pertinent reasons for my submission.

Weather- The earlier in February we start there is a more increased chance of adverse weather conditions for vessels moving around heavily laden with pot gear. If we start later in February we will have gained a substantial amount of daylight making for safer working conditions for crew & vessel and a decreased chance of freezing spray.

Economics- We have the option with our vessel to implement hull and P&I insurance in 2 week increments with the split being the middle of the month. If we start the fishery 3 days or more after the 15th it gives those with the same option to omit 2 weeks of commercial use coverage providing a substantial amount of expense for a high risk fishery. I conferred with a local processor and was in strongly in favor of starting later in the month. Crab is usually when most processors dewinterize their plants and bring in personal for taking care of the product. This is fairly costly for them and with a early Feb. start date it makes it difficult to secure a work force with a 3 week lull with little chance of house between crab and the start of the longline/herring fisheries. We are all working on tight profit margins these days.

Opportunity- We in industry feel that every tide set that passes more crab come out of the mud and become available for harvest. If we can get the water temp. to increase, even 1 degree it seems to have the same effect for crab going on "the bite" making for a better CPUE for permit holders.

Meetings- December and January is when industry and the department come together to discuss the past season and look into the crystal ball of the year to come. When the season opens earlier in Feb. and meetings occur as with this year it makes attending a challenge. If I look around until the Jan. 11 end date for operating pot gear and can get back to town before the afternoon jet on the 12th I might be able to give public testimony and would really like to be on the committee as a whole. A later start date might give more of a opportunity for industry to provide input from what we are seeing on the grounds.

I have conferred with local Dept. staff and they've shared some concerns with my proposal. It was not my intent to have separate start dates for the Tanner & Golden King crab fisheries just could only enter 1 ACC. If the season opens to late the Dept. had concerns with the season going into the spring molting and clutching if you were to adopt another proposal extending the exploratory non-core Tanner season. I feel the dept. has the authority with the EO program to stop and restart that part of the fishery to accommodate any concerns they have. The Dept has also stated that they prefer opening the fishery on the smaller tides.

If we were to amend my proposal to be written as follows I think it would cover the issues brought forth by myself and the Dept.

5 AAC 35.110 Fishing season for Registration Area A

(a) Male Tanner crab may be taken only from 12:00 noon on the date with the smallest Juneau tidal range between **February 18 and February 25**, as announced by emergency order, through May 1.

I appreciate your time and consideration on this proposal which I feel would make the fishery safer and more profitable for all.

Thank You,

Joe Willis

Submitted By
Joel Brady-Power
Submitted On
12/20/2021 1:23:16 PM
Affiliation



PC176
1 of 1

My name is Joel Brady-Power. I am a second generation commercial salmon troller and I would like to submit these following comments to the Board of Fish.

Proposal 80: I support the department's intent to establish provisions in regulation to address overages and payback. If one gear group goes over its allocation they should be the one to forfeit fish the following year. These fish should NOT be taken out of the all gear group quota or any other gear group that stayed within their allocation. At the same time the department should be given flexibility to allow one gear group to go over their allocation if and when needed to ensure that we are able to harvest the all gear quota and not leave fish on the table.

Proposal 82: I would like to support proposal 82 with the amendments from the Sitka AC. I would encourage the department to take full advantage of in-season management tools to keep the mostly non-resident guided sport fishery and emerging bare boat charters to stay within the sport allocation without taking fish away from the resident sport fisherman and mostly resident commercial troll fleet.

Proposal 83: I am opposed to proposal 83 for a number of reasons. During the last treaty negotiation process all of Alaska's gear groups lost fish. Coming out of this process we all knew our bottom line was going to be affected, but why should one gear group, in this case the recreational sector, get special treatment at the cost of the commercial sector? The simple answer is that they should not. The charter industry in southeast Alaska is growing without any limited entry to curtail its exponential growth like that which has been in place for the troll industry since its inception. This growth is largely due to lodges and charter boats that cater to tourists coming in from out of state. Without any limits in place prop 83 will result in an open ended reallocation of king salmon from the mostly resident commercial troll fishery to the mostly non-resident sports industry driven by charter boats and lodges. These are trying times for us all, between the losses we all sustained during the last treaty negotiations and the ongoing struggles in southeast's own rivers and the further restrictions we are all likely to be facing as a result of these stocks of concern. The trollers are not seeking additional fish to make up for these losses at the expense of another sector. In fact trollers have helped pay for the production of king salmon at the regional hatchery associations with the 3% enhancement tax on all of the fish sold from our fleet. The charter fleet and lodges have for years benefitted and caught more fish as a result of this production and yet have not contributed anything to help support these local hatcheries. We are all looking at hard times right now and for the recreational sector to try and mitigate their losses by taking fish from another sector is unjust and wrong. I strongly urge you to oppose proposal 83 and it's clear intention to reallocate king salmon from the largely resident commercial troll fishery to the largely non-resident recreational sector. I would instead steer you towards proposals 80 and 82 put forth by the Alaska Department of Fish and Game as better alternatives to bring the sport fishery into alignment with the updated framework of the SEAK all-gear catch limit and resulting sport allocation.

Proposal 101: I oppose this proposal. Many of the concerns in this proposal are unfounded and not supported by any kind of statistical analysis. Furthermore the chum fisheries that have resulted from these highly effective hatcheries have been hugely successful for many gear groups and the organizations that run the hatcheries themselves.

Proposal 103: I oppose this proposal for many of the same reasons that I oppose Proposal 101 listed above.

Submitted By
Joel Steenstra
Submitted On
12/21/2021 8:38:45 AM
Affiliation



PC177
1 of 2

Comments from Joel Steenstra. Representing myself. I own a two boat charter fishing business that provides lodge style services with the exception of dinners for our clients in Craig, Alaska. We are year round residents of Craig. Our business model is the traditional three day fishing packages with 95% non-resident customers.

My business:

- Collects 5% sales tax for the City of Craig
- Has 8 non-residents eating out nightly at local restaurants and shopping in local stores
- Has approximately 160 non-residents flying on Island Air Express, a local airline on Prince of Wales.

We generate a lot of economic activity on the local level.

Prop 82

I am opposed to prop 82 as written as there will be severe negative impacts on my business and the lodge charter fleet in 2C in low abundance years. 1 or 2 kings annually in June is not sufficient to sustain the lodge fleet when business models have traditionally been 3 day fishing packages. We normally don't see catchable coho numbers by rod and reel until July 15th. By prematurely reducing limits of kings before cohos show up, demand for SE Lodge charters will drop off dramatically which will lead to a reallocation of the kings that were traditionally caught by the lodge fleet. Lodge clientele will not come up to fish for one or two kings in June given our halibut limits and a yellow eye closure.

The following is the **minimum** king salmon limits for charter anglers needed to sustain my charter fishing business:

June: 3 annual
July 1-15: 2 annual
July 15-31: 1 annual
Aug/Sept: Closed

Prop 83

I am in support of proposal 83 with the exception of leaving kings open in August when the sport fleet is expected to go over its 20% allocation. In lower abundance years, king salmon should be closed in August if the sport fleet is going to exceed their 20% allocation. Resident anglers have also had ample opportunity to fish for king salmon by Aug 1st. If kings are kept open in August beyond the 20% allocation, it would make it difficult for managers to predict the amount of kings that will be harvested and could cause an overage that would have to be paid back the following year. With an August sport closure, the managers will be able to get a good count and then open the trollers to catch what they have remaining to catch.

If the sport fleet is going to exceed 20%, the **minimum** needed to sustain my charter business is:

June: 3 annual
July 1-15: 2 annual
July 15-31: 1 annual
Aug/Sept: Closed

Proposals 84, 85, 86

Prioritizing resident anglers over non-resident anglers would lead to a reallocation of king salmon that have been traditionally caught by the

charter fleet to unguided resident anglers. SE charters have made significant investments in boats, lodging, and gear, and are at risk if king salmon were allocated away from them.



If resident anglers were prioritized over charter anglers, there is no guarantee that resident effort would not increase. There are no mechanisms in place to keep resident effort at present levels. This puts the charter fleet at risk as any uptick in resident effort will take away from the charters. The amount of ocean capable vessels now, compared to even 10 years ago owned and operated by Alaskan residents, has grown considerably. Not to mention advanced technology has also enabled many resident sportfishermen to be as efficient as charter vessels in catching fish. Spots that have been traditionally fished by charter boats on the open ocean now have a lot of competition from a good sized fleet of resident boats. Despite being a high dollar industry, the SE charter fleet has no fixed king salmon allocation of its own that is separate from resident and unguided non-residents.



Submitted By
John Elliott
Submitted On
10/4/2021 9:11:09 PM
Affiliation

Phone
9075002289
Email
johnny.m.elliott@gmail.com
Address
514 Monastery St
Sitka, Alaska 99835

Dear Board of Fisheries,

Historically speaking, we are running out of herring in Southeast Alaska. The massive abundance of previous generations is behind us. Herring are critically important to the health of the overall ecosystem and as such we should manage them with a philosophy of reverence and abundance. This is how Lingít people have managed herring for thousands of years and it worked for them. Since the settler State of Alaska took over managing herring, all other Southeast Alaskan populations have been overfished other than what's left in Sitka. As such, I believe we should take a pause on managing herring harvests in the way we have and manage them instead with a philosophy of reverence and abundance.

Please place a moratorium on commercial herring fishing for the next 3-5 years and allow our ecosystems to flourish once again before we return to considering whether the commercial value is worth the cost to the ecosystem and the indigenous people of Sheeł'ká.

Sincerely,

Johnny Elliott



Hello,

I'm John Murray of the F/V Sea Bear, homeport Sitka, AK. I've worked most of my adult life as a boat owner/operator. I've trolled for the most part but also have longlined for halibut and been a crewmember on different boats. I've resided in Sitka since 1978. I've had the troll seat on the Sitka F&G Advisory Committee for about 20 years.

John Murray
224 Observatory St.
Sitka, AK 99835
907-738-6212

Proposal 80 Comments:

- Each gear group should be assigned payback overages next season.
- While this might be a burden for managers, it creates what I call equity. A move towards a working environment of responsibility and restraint for managers and the differing fisheries.
 - Fish tickets, port sampling, electric log book entry, creel census, all work toward the goal of not going over your allocation. I believe more work is needed on the sport fishing side for data gathering.
- What I'm concerned about as a troller is the troll allocation becoming the bank, with no recourse for repaying because the overage comes out of next year's allocation.

Proposal 81 - Support with amended language:

(6) As soon as possible in August, if the department determines that any of the above fisheries will not catch their entire allocation of treaty Chinook for the year, the troll and sport fishery will be opened to harvest those excess Chinook.



Reason to support:

- This seems like the proper, legal, and traditional way of sharing in an allocated fishery.
- The key is to make the Kings available as soon as possible in August.

Proposal 82 - Support:

In general I support this proposal with an added recognition of resident anglers, in the Finding number 93-04-FB SEAK. I see this Plan as a work in progress in response to Proposal 176 and BOF actions January, 2019 at the AKY meeting. It very well might come up again for future work as SOC and catch patterns present themselves in the future.

Reason to support:

- The Proposal prioritizes resident sport anglers to some degree but needs to be further spelled out.
- Per staff comments: “The department seeks the boards clarification on the use of inseason management to annually achieve the sport allocation under all management tiers, without modification of (b)(1) conflicting guidance remains on whether the department should manage the sport fishery to attain an average harvest of 20% of the annual harvest ceiling across the years or annually manage to harvest 20% of the annual harvest ceiling.”
 - (1) I support the option of “annually manage to harvest 20% of the annual harvest ceiling.”
 - (2) I support the use of inseason management to annually achieve the sport allocation under all management tiers without modification of (b) (1).



This is the only practical way to manage the allocation of Chinook salmon under 5AAC 29.060 Allocation of King Salmon in SE Alaska - Yakutat area. It also protects resident anglers.

- While the other option “to attain an average harvest of 20% of the annual harvest ceiling across years” seemed to work out in the past, I don’t see that as an avenue for current management in light of the up to 7.5% PST King reduction in 2018 and lower to medium abundance tiers. For example, 2018 (g), 2019 (g), 2020 (f), 2021 (f) without high abundance tiers (d), (e).

Proposal 83 - Oppose:

As a full time troller, I see this Proposal as a way to get into the troller’s allocation of King salmon. The Proposal doesn’t recognize the long-standing reality that stocks go up and down. Trollers know what to “tighten their belts” means because we’ve dealt with weak Coho runs and/or low abundance of King salmon over the years. It’s part of the way the game is played. SEAGO/Charters need to play by the same rules. They should not be prioritized over the mostly-resident troll fleet.

Reasons for opposition:

- Resident trollers make up 81% of the ownership of troll permits.
- Per Proposal 83’s last paragraph and last sentence, “This Proposal seeks to return troll/sport management to earlier mechanics and clearly define it in regulations.”



- (1) The distinct fallacy of that language is that it looks back to earlier mechanics. The current management regime since the 2018 PST King salmon reduction doesn't bode well for looking forward.
- (2) Since 2018 we have been in a low/medium abundance scenario: 2018 (g) 2019 (g), 2020 (f), 2021 (f). This is what I call the current mechanics, or the reality of the King salmon fishery in SE Alaska.
 - The "bank" and the payback and the loan: First, trollers are not the "bank." Second, what bank would say it's good business practice to loan (King salmon) with an unknown date of payback on the loan. That's what Proposal 83 wants to do.
 - "Be a victim of your own success." That is how I look at the charter fleet. Around 2008 the charter fleet (lodges) asked ADF&G to increase bag and annual limits in May so they could develop markets. This was granted with an annual harvest limit of 3 fish, January 1st to June 30th. It's back to those pesky "earlier mechanics" again. There were some good seasons but since then the all gear Chinook catch was reduced by 15% in 2008 PST and 2018 PST reduction of up to 7.5% King salmon. More fish in May means less fish or no fish in the late season now. It was a choice then and it's a choice now.

Proposal 89 - Oppose

I find this Proposal has a number of pitfalls:

- It is a divisive Proposal amongst the troll fleet.
- I believe it will lead to added incidental encounters/mortality issues during non-retention periods with King salmon. With potential for problems at the PST level.



- I see issues with 5AAC 29.110 Management of Coho Salmon Troll Fishery: (b, 1) & (b, 2) and 2 A & B.
- It also conflicts with 5 AAC 29.065 Allocation of Coho Salmon. Trollers are currently over our allocation percentages by 4%.

Proposal 90 - Support

While this Proposal faces an uphill battle I believe it has merit and makes practical sense. The BOF should approve this as a way to bring it to the light of day at the PSC level.

Reasons for support:

- Since SOC management started in 2018 the spring hatchery access fisheries and the winter King fishery have been greatly curtailed. This Proposal seeks to get a little back in the remaining spring hatchery access fisheries, which are just three in number.

Proposal 91 - Oppose

This Proposal seeks to change the management of 5 AAC 29.100, which is working and has been working since 1994.

Reasons for opposition:

- Divisive issue within the troll fleet. An example of this is Sitka-based trollers (the largest number of trollers in the SE) would generally be opposed to changing to 70/30 under 5 AAC 29.100.



- It really comes down to a choice or preference on whether you'll fish Kings or Cohos during the 2nd King Opening.
- I personally like the 2nd Opener as it gives another chance for a good catch if you missed them on the 1st Opening.

Proposal 115 - Support

This Proposal will add a few more days when week 41 starts earlier in October than the current start date of October 11th.

Reasons for Support:

- The troll fleet has given up most of our spring access hatchery fisheries and up to the last 6 weeks of the late winter King salmon fishery over conservation issues of SOC. It was a big hit for the troll fleet. This Proposal would add somewhere between 4 and 9 days to the early winter King salmon opening date which should help the troll fleet.

Proposal 144 - Support

This Proposal seeks to bring to the board's attention that work needs to be done with rental vessels/bare boat vessels.

Reasons for Support:

- Currently creel census and statewide harvest surveys are the only way to get catch records by these users. I believe we have to take it to the next level: electronic logbooks. So ADF&G can have more accurate and timely reporting.



- There is currently no data on the number of rental vessels by ADF&G.

Proposal 277 - Support

Aligning bag limits from rental vessels with guided anglers makes sense.

Reasons for Support:

- Rental vessels are an ever-increasing niche in SE Alaska. They can and will, over time, add to local depletion of some species, such as halibut.
- This Proposal as well as its companion, Proposal 144, seek to gather data in a timely manner to avoid local depletion of some species.

Submitted By
John Neary
Submitted On
12/16/2021 5:12:01 PM
Affiliation



PC180
1 of 1

I'm very concerned about the ongoing commercial herring fishery in Sitka Sound and do not believe it is being properly managed. Herring stocks have suffered greatly in the last 50-60 years; for example the Lynn Canal stock is virtually gone. The Sitka stock needs to be managed more conservatively with subsistence users as a priority. I support herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166. Whether or not you believe commercial fishing is to blame (and I don't think it is entirely to blame because the factors are complex) it's time to manage the stock differently.



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Sitka, Alaska, and I participate in the subsistence, commercial, and sport salmon fisheries of the Southeast region. I have been a full time commercial fisherman in the waters of SE AK. I remember voting to fund the current hatchery program with a portion of my catch. Starting in about the mid 1980s, I noticed a change happening, more fish! I was working as a troller then, and the increase in coho numbers was dramatic. Some twenty-five years later I began to participate in the SE drift gillnet fishery. This fishery subsists mostly on hatchery raised and ocean raised chum salmon. So, to summarize, I personally have benefited from the SEAK hatchery program for some 35 years, and can't imagine making a living fishing without the hatcheries. Some years salmon make up the majority of my income.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. The fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.



Each year, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.

SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

John Skeele
johnskeele@yahoo.com
(907) 738-9979



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Skagway, Alaska, and I participate in the subsistence and sport salmon fisheries of the Southeast region. I am a past member of over ten years of Upper Lynn Canal Advisory board. Salmon is an important food source.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. The fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

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If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

John Tronrud
johntronrud@gmail.com
(907) 973-2993



Submitted By
Jonathan Emmons
Submitted On
12/23/2021 8:30:32 AM
Affiliation

Phone
253 230 5437

Email
Jonnyemmons@gmail.com

Address
P.O. Box 6492
Sitka , Alaska 99835

Hello, thank you for taking my comment. I SUPPORT Proposals 156, 157 and 158.
I OPPOSE Proposals 159, 160, 161, 163, 164 and 165. Please, I encourage you to consider doing the same. Simply look at our past attempts, and how those attempts have come up short, and how it's not working to protect the herring. It's your job, as the board of fish, to create Stewardship of our most precious resources. Please protect the herring and the future of fisheries in Alaska.



Submitted By
Joseph J Daniels
Submitted On
12/17/2021 8:53:46 AM
Affiliation

Phone
5037046466

Email
josephjamesdaniels@gmail.com

Address
507 Katlian St.
Sitka, Alaska 99835

I, Joe Daniels, SE Alaska power-troll permit holder strongly oppose proposition 83. Individual gear groups should be accountable for holding to their own allocations.



Submitted By
Joseph J Daniels
Submitted On
12/17/2021 8:54:49 AM
Affiliation

Phone
5037046466

Email
josephjamesdaniels@gmail.com

Address
507 Katlian St.
Sitka, Alaska 99835

I, Joe Daniels, a SE Alaska power-troll permit holder, SUPPORT Proposition 80. Individual gear groups should be accountable for their own overages.

Submitted By
Joseph J Daniels
Submitted On
12/17/2021 8:56:38 AM
Affiliation



PC184
3 of 3

Phone
5037046466
Email
josephjamesdaniels@gmail.com
Address
507 Katlian St.
Sitka, Alaska 99835

I, Joe Daniels, SE Alaska power-troll permit holder, SUPPORT Proposition 89. Put the idle permits to use, create opportunity and value for new entrants to the fleet as well as current permit holders.



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Juneau, Alaska, and I participate in the commercial and sport salmon fisheries of the Southeast region. I have lived in Alaska my entire life. I own and operate a commercial salmon troller in SE Alaska. I also am owner of a wholesale and retail business that sells Alaska Wild salmon in the US Midwest. I have made my living salmon fishing for 42 years in SE Alaska. I have been operating a seafood wholesale and retail business for 5 years.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. The fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.



SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Joseph Emerson
sonofemer@hotmail.com
(907) 723-2710

Submitted By
Joseph Emerson
Submitted On
12/22/2021 7:12:00 PM
Affiliation



PC185
3 of 3

Dear Board of Fish Members,

My name is Joseph Emerson. I have been a Alaska resident since 1964. I operate a commercial salmon troller and am also co owner of a seafood wholesale and retail business. The product I catch and sell is sold primarily in Midwestern states of the US. I am opposed to any reallocation of King salmon away from the commercial troll fleet to alleviate reduced bag limits or other restrictions in the commercial guided sport fishing industry. Since I have been fishing I have observed a continual decline of the commercial trollers harvest opportunity due to declining Treaty King Salmon quotas and the unrestricted growth in the guided sport fishery. I believe when the State of Alaska agrees to accept a negotiated treaty Chinook Quota, no group of stakeholders should be allowed relief from the negative monetary impacts at the expense of another stakeholder group. The guided sport fishery still doesn't have a limited entry system in place and the number of participants continues to grow at a unsustainable pace. This unchecked growth continues to erode the commercial salmon trollers harvest and is not fair to those trollers who have purchased limited entry permits. I therefore support and oppose the following B of F proposals.

Proposal 83 Oppose
85 Support
86 Support
92 Support
93 Support
94 Support

Thank You for the opportunity to comment on these proposals.

Sincerely Joseph Emerson



Submitted By
Joseph Hillaire Jr
Submitted On
12/22/2021 11:45:59 PM
Affiliation
Tlingit & Haida Youth Commission

Phone
907-401-0918
Email
josephh679@gmail.com
Address
PO Box 36
Hydaburg, Alaska 99922

I am writing today in support of proposals 156, 157, and 158.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166.

Proposal 156 should be supported because fishing pressure on herring has never been higher than it is right now and the high Guideline Harvest Levels of recent years leave this fishery vulnerable. The Harvest Control Rule in Sitka Sound currently allows for more aggressive herring harvest at low abundance than was administered prior to herring population collapses at Auke Bay, Kah Shakes, and Prince William Sound, among other locales. This harvest control rule would make herring population collapse less likely by lowering the Sitka Sound Guideline Harvest Level at times of low abundance.

Proposal 157 and 158 should be supported because of the growing consensus of the vast importance of older fish for population resilience. The Sitka Sound Sac Roe herring fishery is designed to select for older herring and the population age structure is precarious and vulnerable as a result. These proposals would avoid over-harvesting big fish in years where smaller fish are particularly dominant in the population.

Proposals 156, 157, and 158 would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience.

Proposal 159, 160, and 161 are offensive, baseless, bad faith proposals brought by an industry gear group (called "Southeast Herring Conservation Alliance") against indigenous people. These proposals should be withdrawn by the SHCA or otherwise swiftly rejected. ADFG data demonstrates that access conditions for roe-on-branch harvesters have deteriorated considerably in the last 20 years. Each of these proposals would further harm subsistence users.

I am opposed to Proposal 163 and 164, which would institute a quota system, liberalizing the sac roe seine fishery and expanding the entitlements of permit holders in addition to the obligations of ADFG to the fishery. Under these proposals, more high grading is sure to occur across a wider region, leaving more dead, injured, and stressed out fish in the water while severely disrupting the herring spawning event throughout the entire Sitka Sound area. These two proposals are out of scale with the safety problem they purport to address.

I am opposed to both Proposal 165 and Proposal 166, which should not even be considered, given that they represent permit creep of a sort that has no precedent and has been discouraged by the CFEC in recent years. I am opposed to both of these measures to expand the scope of the G01A (Herring Roe, Purse Seine, Southeast) permits.

Proposals 159, 160, 161, 163, 164, and 165, and 166 lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations.

During the past decade I have been reconnecting to my roots in Hydaburg, AK; I have been gifted herring eggs plenty of times. I wish to see the same for the following generations to come for my community and other Native communities across the state of Alaska.

Still, I believe that none of these proposals goes far enough to advance respectful stewardship and protect wild abundance for generations to come.



Submitted By
Juan Belcher
Submitted On
12/22/2021 11:18:26 PM
Affiliation

Phone
907-738-5826
Email
fishslayer40@gmail.com
Address
PO Box 1505
Sitka, Alaska 99835

December 22, 2021

Proposal 82 and Proposal 83 - King Salmon Management Plan

To the Alaska Board of Fish:

I SUPPORT Proposal 83. And I am NOT in support of Proposal 82.

The 2020 summer season resulted in a 50% to 70% reduction in revenue for most charter businesses. Many did not survive. My name is Juan Belcher and I have been fishing in both the sportfishing charter and commercial fisheries in Sitka, Alaska since 1996. This might not seem like many years by some fishermen's standards, but I feel I have been around long enough to see the changes when charter captain and crew could keep two kings per day, and other species too. And now no longer allowed to keep any Kings, Halibut, Lingcod, etc. while working the sportfishing trips. We now must choose making money in our limited season; OR go personal fishing to access a king salmon.

It seems like every year there are more nails in the coffin. Our boats are sized, and power based on the Southeast Alaska six-line limit. We, in the sportfishing industry do not all own IFQs or do multi-fisheries to balance out changes in market price or fluctuation of abundance in fisheries. We are like a casino! We don't promise 50 lb. king salmon or 300 lb. halibut. This is what we do: We provide a dream and a hope that there is a chance. If only one in a million, but still a chance to catch your dream fish.

If proposal 82 is adopted, the dream and opportunity for any king salmon would be taken away from every independent traveler who comes to SE Alaska to catch a King Salmon. It's like paying for airfare to Hawaii full price and then having the plane turn around half-way there.

Proposal 83 is much more logical to not give the anglers too much in years of high abundance and then not take it away in years of low abundance. It is better to work together with trollers to give them access to our underages in years of high abundance; To make up our overages in years of low abundance.

I think proposal 83 put forth by SEAGO best addresses allowing continued king salmon access to residents, while not reducing their access, allowing trollers to harvest the underages from the charter sector, plus creating a floating mechanism to give stability to the charter sector, which brings outside dollars into local economies! The charter industry is an important component of Southeast Alaska's economic engine, attracting many visitors that support airlines, hotels, restaurants, bars, shops, custom processing facilities, also buying commercially caught seafood to fill up their boxes, bring in lots of sales, bed, and fish box tax from the lower 48, which helps reduce the need for a state tax, higher city sales taxes & property taxes. It keeps money in the city's general fund, which benefits all citizens and user groups in each local coastal community. Does that not have a value to try and protect the stability of this industry?

According to ADF&G saltwater logbook data from 2006 to 2020 there are now 217 fewer active saltwater charter businesses. ADF&G reports on the southeast king salmon sport fishery shows between the years 1999 to 2018 that the all year's floating average catch has been 20.7% sport and 82.2% troll. That is managing very well within the goals for conservation. The federal government could only dream of achieving their goals this close.

Other thoughts: Too much was given up in the salmon treaty, and we have no idea yet, what amount of positive impact to the king salmon resource might develop from a 25% reduction of bycatch by the trawl fleet.

Please adopt Proposal 83 as a better option over Proposal 82.

Thank you for your time and the opportunity to comment.

Sincerely,

Juan Belcher

Submitted By
Juan Cediell
Submitted On
11/16/2021 6:30:01 PM
Affiliation

Phone
5612256283

Email
jcediel4@gmail.com

Address
607 Sawmill Creek Rd
Sitka, Alaska 99835

I support STA





Submitted By
Julia
Submitted On
11/24/2021 6:37:42 AM
Affiliation
Suquamish

Phone
3606897448

Email
Juliahommel@gmail.com

Address
6751 NE Center St
Suquamish , Washington 98392

I am a Suquamish tribal member and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast . I support proposals 156, 157, 158.



Julianne Curry
PO Box 8985
Kodiak, AK 99615
Cell- 928.380.3250
sockeye22@hotmail.com

December 22, 2021

Alaska Board of Fisheries
Public Comments
Via email: dfg.bof.comments@alaska.gov

RE: 2022 SOUTHEAST FINFISH, BOARD OF FISHERIES HERRING PROPOSALS

Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Thank you for the opportunity to comment on proposals during the 2022 Southeast cycle. I am providing comments on the following herring proposals:

Support for proposals 159, 160, 163, 164
Opposition to proposals 156, 157, 158, 167
Comments for consideration 161, 165, 166, 233

I am both a fourth-generation commercial fisherman and a fourth-generation Alaska resident, and I began fishing at the age of 14. I'm currently a second generation permit holder in the G01A Southeast herring sac roe fishery, and I participate in other fisheries in the region. I started participating as a crewmember in the Sitka sac roe herring fishery in 2006, and 2016 was my first year as a permit holder in that fishery. I'm a personal use and subsistence harvester, just like many other commercial harvesters in Alaska. I've been an active participant in the Board of Fisheries process for over 15 years as an advocate for science-based fisheries management, sustainable fisheries, and healthy coastal communities. Coastal Alaska is deeply dependent on a successful seafood industry, as well as personal use and subsistence opportunity.

As a herring sac roe permit holder, my fishing income is fully reliant on the ability of the Alaska Department of Fish and Game (ADF&G) to manage harvest opportunity based on sustainability and available biomass. Sitka herring is one of the most studied fisheries managed by the State of Alaska. It's imperative that ADF&G is given the management flexibility to effectively conduct a sustainable fishery to ensure that users have adequate access to the resource, but more importantly, that the resource continues to be available for future generations.

Permit holders, crewmembers, tendermen, processors, and pilots come from all over the state to participate in the Sitka herring fishery. The economics of this pulse fishery reverberate throughout Sitka, the region, and Alaska. **Given the unpredictability of herring spawn timing, location, and the short duration of open fishing periods, the fleet needs as much stability as the BOF can provide.** Past BOF decisions have significantly impacted commercial harvest area and opportunity in an attempt to appease the anti-commercial advocates who participate in the Southeast BOF meetings.

It's imperative that ADF&G is recognized for their successful and data-heavy management of the Sitka herring stocks. ADF&G has worked tirelessly for decades to continuously improve their



management strategy and incorporate the most up-to-date information all while responding to the constant criticism and questioning of the stock composition model and biomass estimates- despite the robust ADF&G process for reviewing herring methodology (which has included a peer review process). As usual, proposals in front of you at this meeting are attempts by armchair scientists to curtail commercial harvest- not to protect herring stocks as claimed. At each Southeast BOF cycle, similar proposals are submitted to unnecessarily restrict management ability and commercial harvest. ADF&G has a strong history of managing the Sitka herring fishery for the natural fluctuations that occur with all fisheries resources. As such, there is enough herring for all users in Sitka. It's important to acknowledge that although the need for subsistence herring has remained relatively stable, participation in the subsistence fishery has declined resulting in tension amongst users that are not related to commercial harvest of the resource.

PROPOSAL COMMENTS:

Proposal 156: Modify harvest rate control rule for Sitka Sound sac roe herring fishery.

OPPOSE. ADF&G has decades of experience and a proven track record for sustainably managing herring in Alaska. Alaska, Sitka in particular, is the gold standard on the West Coast for herring management. Please allow ADF&G to continue to manage our successful fisheries without interference from anti-commercial advocates. As with all species of fish and shellfish, there are natural ups and downs in herring biomass. This is part of the cyclical nature of natural renewable resources and is not typically a sign of species collapse. There are enough herring for everyone without continually trying to undermine the reputation of our management- both ADF&G and the BOF.

Proposal 157: modify harvest rate for Sitka Sound commercial sac roe herring fishery based on forecasted age structure. **OPPOSE.** See comments from Proposal 156.

Proposal 158: Incorporate forecasted age structure into Sitka Sound commercial sac roe herring fishery spawning biomass threshold. **OPPOSE.** See comments from Proposal 156.

Proposal 159: Repeal this regulation related to management of the commercial sac roe herring fishery in Sitka Sound. **SUPPORT.** ADF&G has the management tools necessary without this regulation to properly manage both commercial and subsistence harvest of herring resources. The implementation of this regulation by a past board has resulted in a costly and lengthy legal battle. Repealing this regulation would ease the state's legal burden while maintaining a subsistence priority and subsistence considerations.

Proposal 160: Reduce closed waters in the Sitka Sound commercial sac roe herring fishery. **SUPPORT.** The 2018 expansion of the core subsistence area boundaries was made with little to no data considered to justify the expansion. Please do not support efforts to keep unnecessary areas closed to commercial harvest based on appearance rather than data. It's also important to note that having an area closed to herring fishing will not force herring to spawn in that area or guaranteeing herring will spawn in that area. ADF&G has decades of information on herring spawn area and deposition that indicates herring will spawn where they want, not where we want them to.

Rationale for the expansion was centered around needing to "give something" to the anti-commercial advocates without providing a tangible benefit or any guarantee of subsistence opportunity. The exponential expansion of the closed commercial area came as a great surprise



to those who depend on commercial harvest given the significant increase in closed waters with little to no justification or discussion on the impacts of the expanded closed area. I urge this board to approach this proposal with additional care and consideration this cycle.

Proposal 161: Require a subsistence fishing permit to harvest herring roe on branches in the Sitka Sound area. *COMMENTS.* As an Alaskan who is dependent on science-based fisheries management to support my business and the ability of future generations to harvest Alaska's abundant resources, I'm supportive of efforts to gather verifiable harvest data to improve management decisions and ensure the continued viability of fisheries resources. However, efforts to improve harvest data have been met with such fierce opposition that it creates unnecessary conflict between users that detracts from other important decisions the BOF needs to make. Commercial herring harvesters are accustomed to accurate and timely reporting, and it seems appropriate to now work towards better accounting for other users.

Proposals 163 and 164: Establish equal share quotas for the Sitka sac roe purse seine fishery. *SUPPORT.* Establishing an equal share fishery for Sitka sac roe would be the single greatest conflict resolution action the BOF could take. The Sitka herring fishery is driven by roe quality and time prior to spawning. This results in an ultra-competitive fishery as 47 boats fight for the same fish in an area that gets smaller each Board of Fisheries cycle. The competitive nature of the fishery creates a dangerous race for fish where vessels try to out-maneuver one another to find large schools of herring with high quality roe.

Past cooperative style herring fisheries have resulted in less vessel damage and injuries, reduced enforcement needs, higher quality roe, and easier management decisions. Establishing an equal split fishery would allow processors to operate at maximum efficiency by feeding a steady and predictable stream of product through plants. By creating more stability with an equal split fishery, ADF&G management would have the ability to become more precise without the stress of ensuring that the right amount of fish is harvested each brief opening.

An equal split fishery would also reduce conflicts between user groups by having the fleet reduce their footprint and impact in the Sitka area. Less racing for fish can result in more cooperative herring which can increase opportunity for commercial harvesters as well as subsistence users.

Proposal 165: Allow G01A permit holders to harvest unharvested Sitka sac roe GHF for food and bait. *COMMENTS.* I will reserve my position on this proposal until I have a better understanding of the issue at the meeting and can gage any unforeseen issues. However, I'm generally supportive of efforts to shift product forms within a fishery as long as the current fishery isn't disproportionately or negatively impacted.

Proposal 166: Create an open pound herring spawn on kelp fishery in Sitka Sound. *COMMENTS.* I will reserve my position on this proposal until I have a better understanding of the issue at the meeting and can gage any unforeseen issues. However, at first glance this proposal appears to have jurisdictional issues that may make it unappealing.

Proposal 167: Redefine the boundaries of the Hoonah Sound spawn-on-kelp fishery (13-C) and the Sitka sac roe fishery (13-A/B). *OPPOSE.* This proposal really just doesn't seem necessary and may result in an unnecessary disruption of the established Sitka sac roe fishery.



Proposal 233: Remove districts 13-A and 13-B from Northern Southeast herring spawn on kelp pound fishery administrative area. COMMENTS. This proposal seeks to remove Sections 13-A and 13-B from the Commercial Fisheries Entry Commission (CFEC) administrative areas for the northern spawn on kelp fishery (L21A). Many permit holders in both fisheries have been consistently frustrated by the confusion and lack of action on this issue. There seems to be either a lack of clarity or lack of will to resolve this overlap. Hopefully the current BOF is willing to do a deeper dive and help resolve this issue to save us all the time and energy during future board cycles.

Thank you for your time and your attention to the fisheries of Alaska. Your effort and dedication to the BOF process is greatly appreciated, especially as we approach the long Southeast cycle. Please feel free to reach out if you need any clarity or have questions.

Sincerely,

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

Julianne Curry

Submitted By
Justin moody
Submitted On
12/19/2021 11:10:52 AM
Affiliation



PC191
1 of 1

I am writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Thanks you.



Justin Peeler

F/V Defiant
4120 Halibut Point Road
Sitka, Alaska 99835
(907) 340-6106
justinpeeler79@gmail.com

December 22, 2021

Marit Carlson-Van-Dort, Chair
Alaska Board of Fisheries
PO Box 115826
Juneau, AK 99811-5526

RE: Comments for SE Finfish and Shellfish Meeting Jan 2022

Dear Madam Chair and Board of Fisheries Members,

As a second generation Fishermen from Petersburg Alaska I have been involved in the salmon, herring, and crab fisheries in Southeast Alaska all my life. As well as many other net, pot, and hook fisheries on the West Coast and Gulf of Alaska. I currently own and operate the F/V Defiant out of Sitka, Alaska.

I currently serve my gear group(seine) as a officer on the board of directors for Southeast Alaska Seiners Association(SEAS). I am also a seine representative on the board of directors for Northern Southeast Regional Aquaculture Association(NSRAA) of which I currently serve as president and serve on the southeast regional planning team. Also serve as a member of the board for Southeast Herring Conservation Alliance. I will be available at the meetings to answer or discuss any topics. I am writing to you on behalf of myself and my comments below are my opinion.

Herring:

Proposals 156,157,158- Oppose

These proposals look to change the management of the herring stock in the Sitka Sound area. I strongly oppose this as there is no biological reason to change the management of this herring stock. These proposals and the group that wrote them intends to change the management of the stock until it becomes not viable for the commercial industry to operate.

Proposals 159- Support

This regulations interpretation and application has been a topic in a recent lawsuit. As written it leaves too much for interpretation. That the department is not following it and/or should shut



down the commercial sac roe fishery till after the spawn. This would eliminate the fishery. This was not the intent of this regulation and it deserves to be rewritten or repealed to eliminate this perception.

Proposal 160- Support

I support removing these closed waters and moving the closed area back to the original “core area” for closed waters. I do not think that closing waters to commercial fishing is going to help substance users meet the “Amount Necessary for Subsistence” goal. Which was used and is used to justify all actions taken against the commercial industry. The only way they are going to reach that goal is by more participation. Which according to the Subsistence division report has been on the decline for years. Please do not think that we as commercial users do not want Substance users to get what they need or want. We do; but closing waters to us is not going to get them what they desire.

Proposal 161- Support

This proposal is to require a permit for subsistence users. The intent would be to get sound information and numbers by subsistence users. I believe getting the best information possible to accurately understand the need and use of the subsistence harvest is needed.

Proposal 163 and 164- Oppose

As a GO1A permit holder as written I cannot support these but if equal quota shares would allow for diversification of the commercial product, I could support them.

Proposal 167- Oppose

This area has been a part of the Sitka Sound herring fishery for a long time and is just a area grab by a outside user group.

Salmon:

Proposal 123- Support

As a SO1A permit holder I support our access to Northern Pink Salmon stocks. This proposal does that and protects north bound sockeyes.

As a member and board member of Southeast Alaska Seiners Association I refer you to the on time comments submitted by SEAS on all other Salmon Proposals.

Shellfish:

Proposals 200, 205,207,and 208- oppose

As a D9AA Permit holder I strongly oppose closing waters to the commercial Dungeness fishermen. There is no biological concern in any of these cases and is just a allocative issue. Closing area to any user group always creates more pressure in others.



Proposal 201- Oppose

As a Sitka resident and commercial crab fisherman I oppose the expansion of the closed waters around Sitka to commercial fishermen. This proposal was written and submitted with no input from the commercial fishermen of Sitka. Upon hearing from the commercial fishermen, the Sitka AC voted to oppose this proposal.

I would like to thank each one of you for serving the people of the State of Alaska. I will be at the meetings and hope to be able to answer any questions you may have.

Thank You,

Justin Peeler



December 22, 2021

Board of Fisheries
Alaska Dept. of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am writing in regards to the upcoming Southeast Board of Fisheries meeting taking place in Ketchikan, Alaska and wish to submit this public comment of support for Alaska's private non profit salmon hatchery program.

I live in Cordova, Alaska, and I participate in the subsistence, commercial, and sport salmon fisheries of the Southeast region.

I wish to extend my support on the record for Alaska's hatchery program and the hatcheries of the region, Southern Southeast Regional Aquaculture Association (SSRAA), Northern Southeast Regional Aquaculture Association (NSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Armstrong-Keta Inc (AKI). I urge you to oppose Proposals 101 & 103.

Alaska created the Fisheries Rehabilitation Enhancement Division (FRED) within the Department of Fish and Game in 1971. Later, in an effort to privatize salmon enhancement, the private nonprofit Hatchery Act of 1974 was created allowing for the application of hatchery permits by Alaskans. The Southeast Alaska hatcheries were founded as private nonprofit entities to benefit the Southeast region, its fisheries, and user groups.

The Alaska hatchery program is designed to increase salmon abundance and enhance fisheries while protecting wild stocks. Fisheries enhancement projects are not permitted by the Department of Fish & Game if they are anticipated to have a significant negative effect on natural production. The fisheries enhancement program is designed to supplement natural production, not replace or displace it. The Alaska salmon hatchery program, in place for over 40 years, is one of the most successful public-private partnership models in Alaska's history. The SSRAA, NSRAA, DIPAC, and AKI hatcheries are important infrastructure in the region and benefit the communities, economy, and harvesters.

SSRAA, NSRAA, DIPAC, and AKI provide measurable economic impacts to the region by providing additional salmon for harvest by all user groups, reducing harvest pressure on returning wild runs in years of low abundance. These significant positive impacts are applied to the economies of coastal communities through the direct benefit of hatchery operations, increased landings, and raw fish taxes of salmon at local ports.

Each year, Southeast Alaska hatcheries provide 2,000 jobs, \$90 million in labor income, and \$237 million in total output.

Chum salmon is the primary focus of Southeast hatcheries. Since chum salmon survival tends to be relatively consistent across years, Southeast hatchery production acts as a large, consistent source of harvests for seafood processors and fishermen.



SSRAA, NSRAA, DIPAC, and AKI together provide significant boosts to salmon fishing opportunity for all user groups throughout the region, especially during years of lower wild run returns. This opportunity is important to Juneau, Sitka, Ketchikan, Wrangell, Kake, Angoon, Haines, Petersburg, and others. Any reduction in hatchery production would impact the stakeholders, communities, and user groups significantly, but would be especially hard hitting during years of low returns.

If approved, Proposals 101 & 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These proposals would reduce or limit hatchery production through direct action by the Alaska Board of Fisheries, directly affecting all hatchery programs in Alaska and having immediate impacts on sport, personal use, subsistence and commercial harvests of hatchery fish statewide.

Thank you for your consideration. Please oppose Proposals 101 & 103 at the upcoming Board of Fisheries meeting in Ketchikan.

Sincerely,

Justin Ryan
justinryan0307@gmail.com
(907) 831-0905



Submitted By
Kaitlyn Conway
Submitted On
11/16/2021 6:29:09 PM
Affiliation

Phone
8172871116

Email
kaitlynconway0123@gmail.com

Address
1341 Glacier Hwy
Juneau, Alaska 99801

I support Sitka Tribe of Alaska proposals 156, 157, & 158. We should listen to the elders and native Alaskans who have been protecting and harvesting herring since time immemorial.

Submitted By
Karina Belcher
Submitted
12/22/2021 10:46:42 PM
Affiliation

Phone
907-738-7553
Email

info@wildstrawberrylodge.com Address
P.O. Box 1505 Sitka, Alaska 99835



PC195
1 of 3

Re: King Salmon Management Proposals 82 & 83 December 22, 2021

To the Board of Fish,

My name is Karina Belcher, and I am a college student who will graduate this May from Boise State University with a degree in Business Administration. I was born and raised in Sitka my entire life and can think of no other place I would like to live after graduating than Sitka. This is not something that most Sitkan or Alaskan graduates say. Attending school out of state is not cheap and I have been able to afford this solely through academic scholarships and working my tail off during the summers and part-time during the winters at a resident owned and operated local fishing lodge here in Sitka that has been in business for over 30 years. I started working there in high school and have been ever since with the goal of learning about the industry, gaining valuable life and work skills, and contributing my part towards showcasing the beauty of Sitka and Alaska to those who have never been here before and creating lifelong lovers of Alaska who travel each year to enjoy a little slice of our rainy, cold paradise and contribute to the local economy with their out-of-state dollars.

Contrary to popular belief, the people who come fishing with us (who I have talked with extensively when setting up their vacations) are not obsessed with catching and taking home massive quantities of fish home with them. The reality is those people who count every pound and do not enjoy the many sights Alaska has to offer, stopped coming to this state a long time ago ever since regulations were severely decreased in the mid 2000s. Those people will not be coming back any time soon. Our current clients are families and friends who are just as excited about a king salmon as they are about a humpback whale breaching and seeing deer on our shorelines.

Alaskan lodges for many years, have been able to offer their clients an unforgettable fishing vacation, emphasis on the fishing. We cannot continue to operate as we have by offering them instead "just the experience and one fish" but hard sell them on "regulations might be x but they might be y." This is a sleazy sales technique used by companies in tourist trap towns with nothing unique or exciting to offer. Alaska is not that way so we should be able to give a reasonable estimate to our guests who are often booking a year in advance of their potential access to the resource during the various months in the summer season. I have read proposal 82 and respectfully believe that should it pass; I would be out of a job along with many of my local Alaskan co-workers. There is a reasonable expectation that a person coming here has when they spend their hard-earned dollars in Alaska. I do not support proposal 82 because it takes away that reasonable expectation, creates huge in-season instability, and destroys one of the few marketable and enjoyable pieces of a May, June, or early July fishing vacation: King Salmon.

As a resident, I want to also keep access to the king salmon for my own use and support resident harvests of king salmon and proposal 83 does a much better job of balancing resident and non-resident access while providing in-season stability and reasonable regulations for those looking to enjoy a slice of fresh Alaskan fish and share it with their family and neighbors.

In my time over the last eight years working in the sport fishing industry, I can recall hundreds of clients who contact us asking where they can purchase locally caught commercial fish for themselves or as a present for others and we steer them towards the many fish processing plants that sell to the public. The fish they catch, or purchase commercially, becomes a great talking point during the holidays when people come together to discuss the highlights of their year, and Alaska is often one of them. By continuing to provide stable regulations and a marketable asset to non-residents, the State of Alaska has a free, organic, and strong marketing campaign that continues to provide and support the local businesses, state economy, and companies who employ thousands of Alaskans every summer.

In my readings of both proposals, I honestly believe that proposal 83 would be a much better alternative to proposal 82 for everyone affected by its stipulations. By all means, should you pass proposal 82 in the name of resource sustainability to residents, **tell me to my face and the rest of us residents, who work in this industry, that a few extra pieces of king salmon in our freezers at the end of the year is worth the following:**

- Losing our jobs
- Missing the out-of-state revenue



- The loss of revenue to the Alaska Department of Fish & Game in the form of fishing licenses and King Salmon stamps
- The loss of local fuel purchases and associated taxes
- The local and regional outboard engine dealers with half the amount of business
- Losing jobs available to high school students and Alaskans during the peak summer months.
- A severe decrease in evening dinner restaurant patronage
- Empty hotels with no other use for their rooms
- Grocery stores and food suppliers losing the money lodges spend on food and meals
- Half the number of flights in and out of the state during the summer
- Alaskan boat builders and welders not being able to keep enough projects going to survive.
- Each individual city losing millions of dollars of sales tax and other local taxes

This is just the tip of the iceberg of how lodges, like the one I work at, contribute vast amounts of commerce to Alaska because of the access to king salmon and other important species. Proposal 82 is not sustainable. Not to the fish, and certainly not to the businesses relying on them. Give it a couple of years with proposal 82 and we will see a dramatic reduction in sport fishing and a resulting negative change to the Alaskan economy. On the surface, it would appear that the whole idea of proposal 82 is to prioritize great regulations and king salmon access to residents throughout the whole summer at the expense of non-resident anglers. **Is axing the sport fishing industry worth this** when the unintentional result would likely be **tax hikes and increased costs of living for residents** that will make subsistence and **resident access to king salmon a luxury reserved only for those who make up the top percentage of income** levels in the state? As currently written, proposal 82 does not appear to solve the problem at hand and would lead to less residents being able to access king salmon because of the increased costs associated with less business activity.

Face the reality of what Alaska will look like should the regulations in proposal 82 become effective because we in the sport industry cannot continue to contribute the same amount to the economy under those conditions outlined. I want to stay in Sitka, and I want to keep the job I have as it combines everything I am skilled and passionate about at the same time. You would be denying Alaskan teachers who guide during the summer a chance to provide for their families beyond the salary they earn teaching the next generations for nine months every year. According to the ADF&G economic impact report from more than a decade ago, the state can kiss 295 million dollars from the state GDP, over 3,000 jobs, and 22 million in state and local taxes goodbye. Even so, these values when adjusted for inflation would be just under 400 million dollars in state GDP and 30 million dollars in state and local taxes. As the office manager of the lodge I work at, I can say that in the 2021 season alone, our clients purchased over \$83,505 dollars of fishing licenses and king salmon stamps. When the average salary of ADF&G personnel is around \$55,000 dollars a year, **can you justify losing a job and a half for each lodge** put out of business by unrealistic regulations? How many important programs and research projects will be cut or suspended because of the lack of revenue brought into one of the largest state organizations aimed at preservation and responsible use of natural resources? We spent more than \$200,000 dollars on outboard engines, parts, and maintenance all from the Sitka dealership this year alone. A substantial portion of the employees (my co-workers) are Alaska residents and young people between 16 and 25 years old, who gain the opportunity to earn money to sustain themselves through the winter, to support their higher education goals, or contribute to their family expenses.

There are only so many Alaskan residents and their patronage alone cannot float the many restaurants Alaskans enjoy. When cruise ship tourists are back on their boat by 4 pm, it's clear to see they are not the groups eating at local restaurants. Sport anglers keep restaurants busy and make up a huge amount of their revenue each evening when they dine out after a day of fishing. Not only do they eat at restaurants, but they also purchase items from local artists, shops, and visit the historical sights that add to the magic of Alaska. When Covid-19 restrictions prevented cruise ships from getting to Alaska, sport fishing travelers still visited the Alaska Raptor Center, the Fortress of the Bears, and took island tours from local guides and companies. This group of travelers (identified as the independent traveler) have the highest value and economic contribution to the state of any other group. Each night they spend in the local hotels and

vacation rentals, is outside money that would not have otherwise been realized by the local taxes and residents who rent their houses. Grocery stores certainly would not want all of the revenue from fishing lodges being wiped off of their books and that would also mean thousands of dollars of commercial caught fish purchased by the lodges to supply to their kitchens wouldn't be sold by the processing plants. We all know that less demand means a lower price to commercial fishermen at the dock (as seen in the summer of 2020 when restaurants and lodges were all shut down in accordance with lockdown restrictions) and many commercial boat owners and families wondered how they would make their boat and house payments when the market prices for salmon and halibut were so low.



Based on conversations with Alaska Airlines and firsthand work at the Sitka Airport, non-resident sport anglers make up two thirds of their demand and in accordance with the normal laws of supply and demand, without those people, there would probably be 2 or 3 flights in and out of Sitka in the summer, similar to the winter, instead of the normal 6 or 7. Every single one of the boats operated at this lodge were built, welded, painted, and outfitted locally and continue to contribute to the economy with each trip they take to the fishing grounds. Given my time spent growing up in Sitka, I think the city administration and Sitkans overall aren't aware of the amount of tax revenue that fishing lodges bring to the town and how much of an impact their reduction in business or total lack of operation would affect the city accounts at the end of the year as well as the increased tax burden each citizen would be facing to make up the difference.

Given your positions on the Board of Fish and your decision-making powers, I don't need to explain to you the components of proposal 82 and 83, but I hope I have helped to shed light on how the adoption of proposal 82 will negatively impact people like myself who just want to continue to work and live in Alaska.

Contrary to what others may testify to, proposal 83 is NOT a mechanism for the sport fishing sector to exponentially increase our allocation of king salmon so the fishing lodges can grow well beyond their means. We are asking for proposal 83 so we can have some semblance of a sustainable fishery for both king salmon and sport fishing businesses. At its core, this proposal can give the sport fishing industry consistency with regards to in-season emergency orders and closures, as the goal is to continue to have a tangible fishing vacation to offer non-residents in May, June, and early July, who appreciate & respect king salmon and Alaska, just as much as resident anglers like myself do. Thank you for your time and consideration of my comments.

Sincerely, Karina Belcher

Sources:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwiP-qu_vj0AhX-

https://www.adfg.alaska.gov/static/home/flibrary/pdfs/sportfish/2007economic_impacts_of_fishing.pdf&usg=AOvVaw2o92ObhhulYh7zeuTBO98T

<https://www.simplyhired.com/salaries-k-adf%26g-jobs.html>

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:51:26 PM
Affiliation



PC196
1 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 80.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:51:50 PM
Affiliation



PC196
2 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 89.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:53:59 PM
Affiliation



PC196
3 of 7

Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 144.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:54:36 PM
Affiliation



PC196
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Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I oppose Proposal 101.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:54:54 PM
Affiliation



PC196
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Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I support Proposal 80.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:55:26 PM
Affiliation



PC196
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Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I oppose Proposal 103.

Submitted By
KARL JORDAN
Submitted On
12/16/2021 2:55:58 PM
Affiliation



PC196
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Hi,

I'm Karl Jordan. My family owns and operates a SouthEast power trolling business.

I oppose Proposal 83.

Submitted By
Karl Wolfe
Submitted On
12/21/2021 8:49:32 AM
Affiliation



PC197
1 of 1

As a 30-year Sitka resident, with personal stakes primarily in the subsistence and sport fisheries, as well as previous experience conducting fisheries surveys in the discussed watersheds; both as an employee of ADF&G and as a private fisheries consultant, I would like to strongly oppose both Propositions 101 and 103. I personally view both these proposals as a scattergun approach by outside interests with an ideological agenda blindly firing and seeing what they can hit.

First. The areas where these hatchery operations are conducted were chosen through a process to occur where stock interactions are non-existent or minimal so that they can be to be effectively managed.

Second. As stated previously I have taken part in not only sport and subsistence activities in these areas but have previously conducted surveys in these watersheds. I can attest by many wet skiff rides that local in-season management is extensive, comprehensive, effective, and adaptable.

Do we let outside interests influence management of our fisheries or do we let the experts do it? The first didn't work so well prior to statehood. I hope the Board gives these proposal's the minimal time and attention they deserve.

Submitted By
Karla Hart
Submitted On
12/12/2021 8:11:25 PM
Affiliation



PC198
1 of 1

I stand with the Herring Protectors in:

SUPPORTING proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska.

OPPOSING proposals 159, 160, 161, 163, 164, and 165 submitted by the Sac-Roe industry.

I'm a lifelong Alaskan who has always questioned the Sac-Roe fishery. Lots of drama, lots of money for a few fisherman, and the death of fish that could spawn year after year, enriching our region's people and fish and wildlife. The Herring Protectors vision for stewardship should be guiding the Board of Game decisions.

Submitted By
Katelyn Stiles
Submitted On
12/21/2021 7:58:26 AM
Affiliation



PC199
1 of 1

I am writing to express my support for proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska. These proposals are practical measures to preserve our Herring populations for all parties into the future. From the research I have done and relatives I have spoken with, Herring have been gradually disappearing from Sitka for decades. We must think about future generations, the health of the Pacific ecosystem, and the economies that depend on it. Pacific Herring are a keystone species, which salmon, sea mammals and other marine wildlife depend on, yet I don't think that our current policies reflect Herring's role in our oceans as a forage fish. This significant position that Herring hold in the ecosystem needs to be carefully addressed with care and nuance, in order to stop harvest practices that cause harm to all of us. I strongly agree with a common-sense sustainability approach to managing our fisheries, lands and waters. Proposals 156, 157, and 158, which I support, are very modest proposals, and I believe we must go even farther if we are going to protect Herring populations for the future.

Herring egg harvest has been a vital part of Tlingit culture for thousands of years and continues to be today. Herring are sacred, and our harvest practices have always been about respect and ecological stewardship, ensuring that the community and Herring thrive into the future. We have ancient oral histories that instruct us of our responsibilities to Herring as our relatives. The decline of Herring is intertwined with colonization, climate change, and racist policies that outlawed Tlingit ways of life. I believe that the Board of Fish and the State of Alaska must listen to the voices of its Indigenous Peoples and governments in order to stop the continual violence that these policies have created. As a citizen of Tlingit & Haida and a member of the Kiks.ádi Clan of Sitka, I strongly support proposals 156, 157, and 158.

I strongly oppose proposals 159, 160, 161, 162, 163, 164, and 165. These proposals lack good scientific backing and respect for subsistence harvesters and Tlingit ecological knowledge. Combined, these proposals could be devastating. Your decisions on these proposals will have affects for several generations to come. Thank you for your time reading this and for making a decision with all of us in mind. Gunalchéesh

Submitted By
Kelly R Warren
Submitted On
12/15/2021 8:23:05 PM
Affiliation
Commercial Fisherman / Permit Owner



PC200
1 of 2

I would like to thank you for the opportunity to comment on the proposals that directly affect my family and I along with my crew members that have been with me for so long.

Concerning Proposals #156, #157, #158. I oppose all three of these proposals because they are based on an agenda other than maintaining a renewable resource. As a permit owner for the SE Sitka Herring Sac Roe fishery I have done my due diligence, as have so many others, and it is painfully obvious that the Sitka Sac Roe Fishery has been managed in such a way that not only is it a sustainable fishery but in a way that the biomass of herring has continued to grow in such a way that we are seeing record numbers of herring as well as record setting numbers in miles of spawn as well as spawn deposition. How anyone can continue to claim that the herring stocks are declining is a mystery to me. The science of management and the record numbers of herring each year speak for themselves.

Concerning Proposal #159. I am in favor of this proposal for the reasons stated in the proposal.

Concerning Proposal #160. I am in favor of this Proposal. Living in Sitka over the last 30 years I have had the opportunity to see firsthand how much effort is being put forth by the tribe to artificially increase the amount of herring spawn necessary to meet their needs. As an industry we have gone above and beyond to ensure that there is ample opportunity for harvesting herring roe. However, there is obviously no end to the claims that the traditional harvesting of herring roe cannot be accomplished under the current management plan. The answer as to why there seems to be no end is quite simple to see for anyone who is willing to look at the facts at hand without any bias or special agenda. A longtime friend of mine that was on the tribal board told me flat out that the tribe would not be happy until the herring fishery was closed permanently. I think it's safe to say in light of the facts pertaining to the health of the herring stocks that the continued lawsuits and proposed regulation changes from the tribe are nothing more than efforts to promote their private agenda.

Concerning Proposal #161. I am in favor of this proposal. The commercial industry is continually being scrutinized from every direction as it should be in order to track all of the pertinent information relating to the fishery in order to gather the necessary facts in order to ensure the continued success of the herring stock which in turn ensures the success of the sac roe fishery. Unless the state steps in and requires a permit in order to harvest subsistence herring roe there is absolutely no way to properly document the effort. Can anyone honestly expect a special interest group to provide information that is anything other than beneficial to their cause? History tells us that expecting that is folly at best.

Concerning Proposal #164. I am in favor of this proposal for several reasons. With the continued scrutiny of the Sitka Herring Sac Roe fishery, I believe that it is important to create a fishing environment that promote safer fishing practices for everyone concerned. With an equal quota share fishery there will be no need to conduct a "Shoot Out" type fishery. An equal quota share fishery will ensure that there will be less damage to boats, nets and crew. An equal quota share fishery will allow Fish & Game to prosecute a more closely monitored fishery in terms of catch rates in different areas due to fewer boats fishing. With the market for herring roe being what it is now an equal quota share fishery would allow the permit holders to fish in a way that is more productive financially. In all honesty it's time to do away with the type of fishery that promotes a battle between the permit holders and create a fishery that promotes the safe harvest of a renewable resource.

Concerning Proposal #165. I oppose this proposal. As a permit holder I agree in principal that we should be able to harvest the remaining herring quota for alternative markets once the dedicated sac roe fishery closes. However, the herring fisherman are under constant attack by special interest groups claiming that the herring biomass is suffering at the hands of the state's current management plan. Science and the fact that the herring biomass is larger now than it has ever been does not seem to affect their allegations or their efforts to spread false information to the masses. Allowing permit holders to continue to harvest herring for different markets after the dedicated sac roe fishery would only have a negative impact on the fishery at this time. Perhaps when the special interest groups finally realize that they cannot manipulate the fishery politically and quit spreading so much false information the herring fishery will finally be able to be managed in a way that will allow the permit holders to harvest the available herring for markets other than for the roe only. Until such a time any additional fishing effort is a step in the wrong direction.

Concerning Proposal #166. I oppose this proposal. Trying to prosecute two different fisheries at one time in the same location is asking to much of Fish and Game. It would also no doubt create problems between the two different gear groups that would end up requiring more regulations to be created on issues that are obvious as well as those that cannot be foreseen.

Concerning Proposal #167. I oppose this proposal. It is unfortunate that herring biomass in Hoonah Sound no longer supports a Roe on Kelp fishery. Nature does not always repeat itself the way we would like. Whether we like it or not anytime we gear up for a fishery or purchase a fishing permit we are taking a risk. We try to mitigate that risk as much as possible but it is still a risk. We cannot control the movements of fish or the changes that occur in nature. If we set a precedence to redefine boundary lines every time a fishery does not produce in the way that we had hoped we are opening up the possibilities for redefining boundary lines in every fishery that exists in the state when they don't perform the way we would like.

Concerning Proposal #233. I support this proposal for the reasons stated in the proposal.

Submitted By
Kelly Warren
Submitted On
12/16/2021 10:51:40 AM
Affiliation
Fisherman / Permit Owner



PC200
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Thank you for taking the time to consider my comments of these proposals. I appreciate all of the hard work and effort that goes into what you do as the Board of Fisheries for the entire State of Alaska.

Concerning Proposal #190, I support this proposal. Under the current management plan there have been little to no fishing opportunities. As a Red King Crab permit owner, I feel that this proposal is the best solution to accomplish continued protecting the red king crab stock while at the same time providing at least some fishing opportunity for permit owners. With an equal quota share fishery F&G would be able to predict and manage the harvesting of Red King Crab in a way not previously possible. It will allow F&G to prosecute a fishery without the inherent risk associated with the traditional open Red King Crab fishery. It will also allow fisherman to stack permits so there will be fewer vessels fishing which will also aid F&G keep track of harvest levels in different areas.

Concerning Proposal #191, I support this proposal. With the cuts in state budgeting, it's understandable to consider the possibilities that the funding for the Red King Crab survey may not be renewed. In that event we would like to have an additional management plan in place. This proposal accomplishes this goal while at the same time continuing to ensure the protection of the stock.

Concerning Proposal #192, I am in favor of this proposal. The proposal includes all of the explanations and information that I believe is necessary so I will not add to it.

Concerning Proposal 195, I oppose this proposal. Changing the pot limit for Golden King Crab to mirror the limit for Tanner Crab for the reasons stated in this proposal is not justified. Golden King Crab fishing is entirely different than Tanner Crab fishing and trying to manage it the same way would be a mistake. The rate at which we haul Golden King Crab pots is such that the additional 20 pots make a big difference. Penalizing the fishermen to make things easier for F&G is not sufficient reason for reducing the pot limit. It should not be difficult for F&G to know exactly who is fishing 100 pots and where with the preseason registration coupled with the daily call-in requirements for ALL Golden King Crab fishermen.

Concerning Proposal #197, I support this proposal. I believe that this is a necessary change needed in order for more area to be explored. As stated in the proposal, the combination of weather and the size of the area make it extremely difficult to travel. With the current time restraints, it is not worth the risk to miss crucial fishing time in order to explore other areas. The additional time would allow a fisherman the opportunity to continue to fish productively during the core and non-core fishing window with time left to explore other areas.

Concerning Proposal #199, I support this Proposal. It brings to light a valid point. For many of us the time that we are out fishing the non-core areas are the only time we are in an area to fish for subsistence shrimp and Dungeness crab. It makes no sense to have to make a special trip with the additional expense to travel a second time to the same area in order to subsistence fish for shrimp and Dungeness crab. This proposal also makes a good point in that a sport shrimp pot or Dungeness pot is not going to catch a legal tanner or golden crab.