



December 22, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> 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 sport salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is important because it supplies us food and provides days of good clean family fun.

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,

Matthew Roys  
akroys@gci.net  
(907) 586-6264

Submitted By  
Max Kritzer  
Submitted On  
12/21/2021 10:47:54 PM  
Affiliation



PC252  
1 of 1

I'm writing 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'm opposed to proposals 159, 160, 161, 163, 164, 165, 166, which lack good scientific justification, disrespect subsistence users, and run the risk of further damaging and reducing herring populations.

Submitted By  
Maya Reda-Williams  
Submitted On  
12/19/2021 5:47:36 PM  
Affiliation



PC253  
1 of 1

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

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

It is no secret that fish stocks can be depleted. It is no secret that they are being depleted and threatened. How is it that Alaska can be home to the most sustainable fisheries as well as some of the most exploitative fisheries, namely, the herring fishery happening in Sitka Sound outside my home town of Sitka? There can be, and there was, enough fish to be financially viable and support the subsistence gatherers that depend on this resource. Our ways of life in Alaska are a source of pride, which I am sure you share, but if we aren't smart and careful with how we are protecting those resources, jobs, and foods that give us pride, we'll lose that. Listen to the science, and listen to the communities. We want everyone to win, including the commercial interests, but we just need to work on that balance within the herring fishery, and my support of certain proposals and opposition of certain proposals reflect that. Protection, regulation, and sustainability are not dirty words meant to exclude and put people out of work. On the contrary, these efforts seek to allow people to work, to fish, and to teach their children how to do these jobs. But if the herring are all caught, then no one else can be a part of it, and what fun is that? What does that do for anyone? The story of the atlantic herring is one of caution, and we have an opportunity to fix the mistakes that happened across the ocean. We're tightly knit communities here in Alaska, and our foods and way of life are a huge part of that, which I know that you know. Fishing is a source of pride, gathering herring eggs is a source of pride, please don't allow that pride to vanish with the herring. This is so important, to people, to ecosystems, to jobs, and to our pride as Alaskans. If nothing else, this vote should be postponed until you can get an accurate depiction of the stocks in question as, to my knowledge, these has not been a full assessment since the 90's. It is incredibly irresponsible to be making these decisions without the accurate fish counts to support your decision. If anything, it makes more logical sense to be conservative now in the fishing approaches until the assessment can be done, and then, if appropriate, loosen things up then. You're scientists, be logical, be responsible, and think long term. You'll always make enough money, because your paycheck is dependent on there still being fish, not the extinction of fish. Act in your own self interest if anything, and protect the herring.

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 run the risk of further damaging and reducing herring populations.



Submitted By  
Megan Moody  
Submitted On  
12/19/2021 11:13:22 AM  
Affiliation

Phone  
6176008635

Email  
[Megan.Rahija.bush@gmail.com](mailto:Megan.Rahija.bush@gmail.com)

Address  
PO Box 564  
Tenakee, Alaska 99841

Hello,

I'm writing in support of herring proposals 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166. Herring are the underpinning of so much marine life and we all depend on their protection. Thank you.

Submitted By  
Mel Izard  
Submitted On  
12/22/2021 3:19:48 PM  
Affiliation



PC255  
1 of 1

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

Submitted By  
Melissa E Wechter  
Submitted On  
11/17/2021 7:37:39 PM  
Affiliation



PC256  
1 of 1

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3604413411  
Email  
[precht.melissa@gmail.com](mailto:precht.melissa@gmail.com)  
Address  
4100 taku blvd  
Juneau, Alaska 99801

I support proposals 155,156,157 to protect herring to protect orcas!



Submitted By  
Michael g Benson  
Submitted On  
11/16/2021 6:31:29 PM  
Affiliation  
Tribal Member

Phone  
19073100129

Email  
[michael\\_benson99501@yahoo.com](mailto:michael_benson99501@yahoo.com)

Address  
207 Muldoon rd  
323  
Anchorage, Alaska 99504

I support Sitka Tribe on all of it's efforts to Protect our way of life that has been here more than 12,000 years





Submitted By  
Michael Kohan  
Submitted On  
12/22/2021 12:03:59 PM  
Affiliation  
Sitka Salmon Shares

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Address  
216 Smith St. B  
Sitka , Alaska 99835

**RE: Southeast and Yakutat Finfish and Shellfish Proposals: 83 & 172**

Dear ADFG Board of Fish members,

Founded in 2010, Sitka Salmon Shares is an innovative seafood company dedicated to providing a premier wild Alaska seafood experience for home cooks across the country, while supporting small-boat Alaskan fishermen and fishing communities. The company specializes in delivering premium-quality, responsibly-caught seafood to customers mostly in the Midwest, but increasingly nationwide, via an online seafood market. Sitka Salmon Shares has a seafood processing plant in Sitka, a distribution facility in Galesburg, Illinois, and a marketing and finance hub in Madison, Wisconsin. Our investors represent our commitment to community-based capital and include 22 fishermen-owners and growing. Our subscription-based model delivers ~4.5 lbs. of premium Alaska seafood monthly to the doorsteps of our community of subscribers.

Regarding proposal 83 and related proposals, king salmon is an important offering to our subscribers and a cornerstone to the economic viability of the local commercial troll fleet we support and depend on in Sitka. With close to 85% of the statewide commercial hand/power troll permits owned by Alaska residents, and just over 83% of the fleet represented by residents of Southeast Alaska, the troll fleet is truly connected to the king salmon resource in Southeast Alaska (CFEC accessed for 2021; S05B, S15B). Unfortunately, comparable residency information is not available for all user groups that participate in harvesting the resource. As the troll fleet faces economic challenges such as small fish sizes, decreased returns, and an ongoing lawsuit that could close the commercial troll fishery that could trigger a cascade of effects to the other commercial, charter, personal use and subsistence salmon resources, entertaining proposals that re-allocate the resource during low abundance years for other fisheries to absorb puts the viability of the fleet and our business in jeopardy. Accountability through in-season management is a welcomed improvement to the sport fishing sector and is something that the department should build off of and not eliminate going forward.

Regarding proposals 172 and related proposals, Sitka Salmon Shares depends on a good percentage of the Southeast Alaska spot shrimp pot fishery for our business and supports the proposal to move the fishery opener to a spring/summer season for not only districts 2 and 6, but all Southeast districts. The current structure of the management plan contradicts conservative management practices by facilitating a compounding scenario of harvesting in the reproductive season that results in decreased populations, localized pressure, and reduced shrimping seasons. We support previous comments by ADF&G staff that reference enhanced biological conservation and fishery management.

Thank you for your consideration of our comments.

Respectfully,

Sitka Salmon Shares



**From:** [Big Mike](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** King salmon management proposals 82 and 83  
**Date:** Sunday, December 19, 2021 5:06:16 AM

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

Chair Carlson-Van Dort and members of the Board:

**Hi my name is Michael  
Leboki owner of Eagle  
Charters and Lodge in Elfin  
Cove, Alaska. We have  
operated in the Icy Strait,  
Cross Sound and the  
coastal waters between  
Cape Spencer and Cape  
Cross for over 35 years.  
Sportfishing in Elfin Cove is  
my family's primary source**



**of income. Along with my lodge, I own a personal residence there. We help support the local economy in Elfin Cove and in Juneau. We rent boat condos all year round to store boats in Juneau from local business owners. Our primary source of transportation for our clients to our lodge is Ward Air and Alaska Seaplanes. The maintenance on our fleet is performed by local marine shops in Juneau and our food, fuel, building materials and other supplies are also purchased from Juneau. We employ**



**citizens of Juneau to work at Elfin Cove and also in Juneau year-round. King Salmon are a very critical part of our operation and it's really what brings people to our lodge for fishing. I feel it is critical to keep this fishery open for the entire season because a lot of our clients base their decision on coming on whether they can keep a King Salmon or not. It is important in the first part of our season to have a non-resident annual limit of at least three kings.**

**I do not support proposal 82 because I feel that non-**



**residents will not have opportunities to keep King Salmon during low abundance years. Most of the time before people will book a trip at our lodge, they will ask about the King Salmon limits. Due to emergency shut downs of fishing King Salmon in August in the past where they had already purchased their King Salmon permits. If I cannot give them an answer they are reluctant to book. I feel that it's important to manage limits for non-residents and I think it's critical that residents have**



**suitable and stable limits year-round as well. I do support proposal 83. I think it would be better for customers to have the same limits year after year in high abundance years as well as low abundance years. It could be challenging to market our business and keep people traveling to our community year after year with unstable regulations. I hope the board can find a resolution to keep sportfishing for King Salmon open all season for both residents and non-residents. I feel that it will**



**bring great success to our  
economy and our industry.**

**Thank you,**

**Michael Leboki**

**Owner and Captain Eagle  
Charters Lodge in Elfin  
Cove, Alaska**



**From:** [Elfin Cove Resort](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\); forrest@seagoalaska.org](#)  
**Subject:** Fishery Proposal 82 and 83  
**Date:** Wednesday, December 22, 2021 1:07:06 PM

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Hi my name is Michael Legowski owner of Fishmasters Inn and Elfin Cove Resort in Elfin Cove, Alaska. We have operated in the Icy Strait, Cross Sound and the coastal waters between Cape Spencer and Cape Cross for 11 years and the previous owner fished since the early 70's. Sportfishing in Elfin Cove is my family's primary source of income. We help support the local economy in Elfin Cove and in Juneau. We rent boat condos all year round to store boats in Juneau from local business owners. Our primary source of transportation for our clients to our lodge is with Alaska Seaplanes. All maintenance, fuel, part, and supplies come from Juneau including food and other items needed for the lodge. King Salmon are a very critical part of our operation and it's really what brings people to our lodge for fishing. I feel it is critical to keep this fishery open for the entire season because a lot of our clients base their decision on coming on whether they can keep a King Salmon or not. It is important in the first part of our season to have a non-resident annual limit of at least three kings.

I do not support proposal 82 because I feel that non-residents will not have opportunities to keep King Salmon during low abundance years. Most of the time before people will book a trip at our lodge, they will ask about the King Salmon limits. Due to emergency shut downs of fishing King Salmon in August in the past where they had already purchased their King Salmon license. If I cannot give them an answer they are reluctant to book. I feel that it's important to manage limits for non-residents and I think it's critical that residents have suitable and stable limits year-round as well. I do support proposal 83. I think it would be better for customers to have the same limits year after year in high abundance years as well as low abundance years. It could be challenging to market our business and keep people traveling to our community year after year with unstable regulations. I hope the board can find a resolution to keep sportfishing for King Salmon open all season for both residents and non-residents. I feel that it will bring great success to our economy and our industry.

Best Fishing,

Michael Legowski

(907) 957-8103

[Mike@ElfinCoveResort.com](mailto:Mike@ElfinCoveResort.com)





December 22, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> 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 Elfin Cove, Alaska, and I participate in the commercial and sport salmon fisheries of the Southeast region. I run 6 charter boats and a lodge. Salmon fishing provides income for my whole family and many others.

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,

Michael Legowski  
fishmastersinn@gmail.com  
(907) 957-8103



Submitted By  
Michaela  
Submitted On  
12/22/2021 7:16:05 PM  
Affiliation

Phone  
9078309025  
Email  
[michaela.goade@gmail.com](mailto:michaela.goade@gmail.com)  
Address  
PO Box 1204  
Sitka, Alaska 99835

Hi, my name is Michaela Goade and I am a Caldecott Medalist and New York Times best-selling artist of books for children. The books I work on center Indigenous voices and predominantly focus on the environment and a shared sense of connection between all living things. This place – Lingít Aaní – is at the heart of the work I put out into the world, and like many other locals (Native and non-Native) from the region, this place is at the heart of our way of life. In fact, I am planning on writing and illustrating a book about herring. I grew up in Juneau and currently live in Sitka, and belong to the Lingít Kiks.ádi Clan. The women in our clan are called Herring Women, as respect for herring is foundational to our traditional values. My grandmother, Katherine Wanamaker, grew up in Sitka and her parents and grandparents did as well.

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 greater than it is today and the high Guideline Harvest Levels of recent years have left this fishery vulnerable and continue to do so. 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 peoples. 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 Proposal 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 claim 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. Tlingit knowledge IS science. Our ancestors have been stewarding this land for thousands of years.

All that said, I firmly believe that none of these proposals does enough. None of them go far enough to advance respectful stewardship and protect wild abundance for generations to come. It is all of our responsibility to ensure that this region has a future, that our children and grandchildren can live off the land.

Gunalchéesh,

Michaela Goade



Alaska Bd of Fisheries  
Please distribute to each  
Bd member and add to  
the record.

Mike Wetters  
P.O. Box 210003  
Nulke Bay, AK 99821  
P.O. Box 14  
Tenakee Springs, AK  
99841  
12/2/24  
907-321-1186

Dear Board Members

I urge you to oppose proposal 202 which proposes to reduce or eliminate the area closed to commercial dungeny fishing near the community of Tenakee Springs.

This area was closed initially years ago to commercial crabbing because of severe commercial/personal use conflicts. Since that time it has provided crab to residents of Tenakee and other Alaska residents many which are local property owners. The area is large enough that users can spread out and usually catch crab. Size of area is appropriate for benefit use. Use of this area by "Yacht Charters" is minimal if any. Commercial users have the entire remainder of Tenakee Inlet. Please keep this personal use sanctuary in place as it currently exists.

Thank you!  
Mike Wetters

Submitted By  
Mike Sullivan  
Submitted On  
12/22/2021 4:45:28 PM  
Affiliation  
Owner operator of a charter fishing business



PC263  
1 of 1

Hello board of fish, my name is Mike Sullivan and I am an owner operator of a charter fishing business here in Sitka, AK. I've been in operation for the last 10 years.

First of all, I support proposal 83. I'm a year round resident who relies on consistent king salmon regulations. Not only for my own personal use, but for my clients who are coming to town and supporting our local economy. Inconsistent king salmon regulations could cause cancellations and less bookings which will in turn lessen my revenue as well as the city's revenue.

All bookings create a revenue to various parts of our local economy. For example; bed tax, sales tax, fishing license, grocery store, liquor store, restaurants etc.

In season closures make it difficult to operate and keep repeat clients coming back for future trips.

Sitka is known for its king salmon. Being able to provide an opportunity to retain king salmon is paramount to southeast Alaska's fishing tourism.



Submitted By  
Mike Warner  
Submitted On  
12/22/2021 3:26:24 PM  
Affiliation

Phone  
997-351-2978

Email  
[goochwarner@hotmail.com](mailto:goochwarner@hotmail.com)

Address  
PO Box 18146  
Coffman Cove, Alaska 99918

I am writing in firm opposition to Proposal 153 concerning closure of Log Jam Creek falls. This area has long been used as a fishing spot for summer run cohos for the residents of Coffman Cove. The closure was prompted by someone apparently concerned about fishing during low water conditions. ALL information presented, which was minimal, was anecdotal and NOT based in any sort of fact. The biologist present said there is ZERO biological justification for any concern or closure. Zero concern.

This area has been used so long, there are fishing signs located on the highway to point it out. And there is still ZERO biological concerns about the run.

Please disregard this proposal as unwarranted and not based in facts.

sincerely,

Mike Warner



Submitted By  
Molly Emerson  
Submitted On  
12/22/2021 9:09:11 PM  
Affiliation

Phone  
9072098591  
Email  
[molly.j.emerson@gmail.com](mailto:molly.j.emerson@gmail.com)  
Address  
10410 Dock Street  
Juneau, Alaska 99801

Dear Board of Fish Members,

I am a member of the local Southeast AK community. I was raised in Juneau and am friends and family with many commercial fishermen in the region.

I urge the board to reject **any** proposals that re-allocate King Salmon quota to the charter industry and thereby reducing quota from the local commercial salmon fishing fleet. The commercial fishing fleet has operated for decades as a limited entry, permitted market. All of the stakeholders have paid into a system to ensure that the amount of harvesting boats is sustainable and controlled.

In contrast, entrance to the charter industry has been left intentionally uncapped, without requiring any permitted entry to the market. Therefore, the number of harvesting boats and stakeholders has dramatically grown over the recent years.

There are predictably now more charter boat stakeholders fighting for the same charter quota of King Salmon. This quota was agreed upon through lengthy negotiations in the U.S./Canada Pacific Salmon Treaty.

Just because there are more people fighting over a slice of pie does not mean they deserve another slice of pie. It instead shows we perhaps need a limited entry system of charter boats, just like all the other salmon fisheries here in Alaska.

Thank you for your consideration,

Molly Emerson



Submitted By  
Nancy  
Submitted On  
11/4/2021 11:32:45 AM  
Affiliation  
Keen

Phone  
907-500-8862  
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[ravenlady58@gmail.com](mailto:ravenlady58@gmail.com)  
Address  
PO Box 1055  
Haines, Alaska 99827

I would like to submit a comment, regarding the Sitka Sac Roe Herring Fishery. I am an Alaskan Native woman, who depends on the Herring Traditional Harvest. We have been reliant on traditional use of herring, since time immemorial.

In over 60 years of mismanagement by the ADFG, we are seeing the evitable extinction of herring.

**In our lifetimes.** It is time to shelve the ego's, and genuinely engage in '**Traditional Ecological Knowledge.**' Herring is, and always will be 'a forage fish'.

I support proposal numbers : 156,157, and 158.

I **do not** support proposal numbers : 159,160.161,163,164, and 165.

Thank you for your time. Nancy Keen





Submitted By  
Naomi Michalsen  
Submitted On  
12/22/2021 4:38:06 PM  
Affiliation

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87 Chacon Street  
Ketchikan, Alaska 99901

As a Tlingit grandmother and mother of children whose father's family belongs to the Tlingit Kaagwaantaan of Sitka, we have been eating herring eggs and caring for this place, Tlingit aani, our entire lives.....and for as long as our Tlingit history can be remembered. This whole and nutritious food is not only good for our physical wellbeing and health but we also know that this powerful food is critical for our spiritual, emotional and mental health as well.

I want to make sure that our precious foods are protected from any harmful commercial fisheries practices today and in the future. I stand for those who come after us, our future generations. I want to make sure that our traditional foods will always be accessible to the Indigenous peoples of this land.

I strongly support proposals 156, 157, and 158 submitted by the Sitka Tribe of Alaska and strongly oppose proposals 159, 160, 161, 163, 164, and 165 submitted by the Sac-Roe Industry.

Thank you,

Naomi Michalsen



Submitted By  
Natalie kilmer  
Submitted On  
12/22/2021 9:21:38 PM  
Affiliation

Phone  
4153417559

Email  
[Nataliejanekilmer@gmail.com](mailto:Nataliejanekilmer@gmail.com)

Address  
905 sunset pl  
Ojai, California 93023

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.

Thank you  
Natalie



Submitted By  
Natalie Watson  
Submitted On  
12/16/2021 11:28:00 AM  
Affiliation

Phone  
6174606338

Email  
[kwan.myong@gmail.com](mailto:kwan.myong@gmail.com)

Address  
9350 Glacier Hwy  
Juneau, Alaska 99801

I am writing out of concern about the decades-long collapse of herring in Southeast Alaska. This represents a failure of ADF&G to protect this crucial resource, one that has sustained human populations up and down the coast for millennia. Overfishing by commercial fleets have devastated the herring, and so far none have returned. We should be doing everything we can to protect the remaining herring and also trying to restore them, for the benefit of future Alaskans who may well need this resource to survive.

I am in support of herring proposals 156, 157, and 158. Proposal 156 will help protect the herring by reducing the fish available to the commercial fleet in extremely lean years. I am particularly concerned that the herring coming into Sitka Sound are protected so that this remaining population will not collapse.

I also want to make sure that subsistence harvesters can still gather and share herring eggs. Subsistence users are not responsible for this terrible loss and should not be punished. This is why I oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Thank you for protecting our precious resources.

Submitted By  
Nathan Borson  
Submitted On  
12/17/2021 6:16:54 AM  
Affiliation



PC270  
1 of 1

I support a thriving herring stock, one that grows towards pre-historic abundance. I also support prioritizing proven, time-honored, sustainable subsistence use of this culturally-important resource over the commercial fisheries that have so depleted herring since they started. Therefore, I ask you to support proposals 156, 157, and 158, and I ask you to oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Submitted By  
Nathan White  
Submitted On  
2/17/2021 12:34:56 PM  
Affiliation  
Student



PC271  
1 of 1

#### Proposal 172

I am against the proposal to move the shrimp fisheries from October to May. First of all, the vast majority of fisherman are occupied with other commercial fisheries. Secondly, the shrimp are soft and nasty after they lay their eggs. Thirdly, The tourists will not eat the shrimp if they are soft, but the tourists that come when the shrimp are firm and good will pay double what the other tourists pay for soft shrimp. Last but not least, people for this proposal will say that it will be worth it for the money, but we could change the tourist season to accommodate the better shrimp and advertise that to the tourists. These are all of the reasons that changing the commercial season is the wrong thing to do.



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic Atmospheric Administration  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau Alaska 99802-1668



PC 272  
1 of 3

November 10, 2021

Alaska Department of Fish and Game  
Board of Fisheries  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Chairman Carlson-Van Dort:

The Alaska Region National Marine Fisheries Service wishes to provide the Alaska Board of Fisheries with the following information on one regulatory proposal for your consideration during the upcoming meeting in Ketchikan, Alaska that could impact State of Alaska and Federal fisheries participants. Please let us know if you have any questions concerning our letter.

Sincerely,

James W. Balsiger, PhD.

Administrator, Alaska Region





**Southeast and Yakutat Finfish and Shellfish  
Interaction between Federal and State of Alaska Fisheries  
Alaska Board of Fisheries Meeting – January 4 - 15, 2022  
NMFS Comment (Proposal 232)**

**Proposal 232: 5 AAC 28.1XX. Create new regulation to establish a pot fishery for spiny dogfish in Southeast (SE) Alaska.**

**Potential Issues:**

- *Stock biomass is unknown in SE which may cause unintended overfishing.*
- *Directed fishing for spiny dogfish could increase bycatch of other commercially important species such as halibut, rockfish, and crab.*
- *Fishing disproportionately on immature sharks could lead to an unsustainable population.*
- *Females have an 18-24 month gestation period so directed fishing would overlap with reproduction regardless of the fishery timing.*

Proposal 232 seeks to create a pot fishery in SE Alaska for spiny dogfish. According to 5 AAC 28.105(a), the western boundary for the SE district of Alaska is 144° W. long. which would encompass federal reporting areas 659, 650, and part of 640. It is unclear in this proposal what the basis would be for the amount of the guideline harvest level (GHL). Under federal management, spiny dogfish are managed as part of the overall shark complex Gulf of Alaska (GOA) wide. Although spiny dogfish share an overall overfishing level (OFL) and acceptable biological catch (ABC) with other sharks, the stock assessment of the shark stock complex in the GOA does calculate a separate OFL and ABC for spiny dogfish. However, there is not a federal trawl survey in area 659 and biomass in that area is unknown and not included when determining the OFL or ABC for the shark complex. The stock assessment states that trawl survey catch of spiny dogfish in the rest of the GOA is highly variable from year to year resulting in no obvious trend in biomass estimates. This may indicate that they are easily missed during the survey due to both their migratory nature and their preference for near surface waters in the summer months. Spiny dogfish bycatch is unknown and unaccounted for in State salmon and groundfish fisheries because most state managed fisheries do not require observer coverage. Without reliable biomass estimates and with undocumented spiny dogfish bycatch in the State fisheries, a directed fishery could result in overfishing. In addition, because this species is highly mobile and moves between management areas, state-water's catch may potentially impact the entire GOA stock.

Directed fishing for spiny dogfish could increase bycatch of other important commercial species such as halibut, rockfish, and crab. Rockfish in particular are susceptible to high mortality rates. Rockfish have a closed swim bladder and quick changes in pressure that occur when rockfish are caught and brought to the surface damages their internal organs regardless of the gear being used. The extent of possible bycatch is unknown since there has not been directed fishing for spiny dogfish with pot gear and there is no federal observer data. In addition, it is unclear how pots might need to be modified to accommodate a spiny dogfish fishery and how those pots would then respond to bycatch of other species.



Spiny dogfish are a slow growing species with low fecundity and population stability likely depends on high survival rates to maturity. The stock assessment states that spiny dogfish are among the most vulnerable species in the GOA fishery management plan and would likely not withstand heavy fishing pressure. This proposal seeks the use of pot gear, which would allow them to target immature animals and release mature females. However, for long-lived, slow-growing species with low fecundity it is beneficial to the population for an individual to be allowed to reproduce at least once. If the majority of spiny dogfish removed from the stock are immature and have not yet reached an age to contribute offspring, the spiny dogfish population could decline as a whole.

Female spiny dogfish have an 18-24 month gestation period so if there were a directed fishery it would overlap with reproduction regardless of the fishery timing. This proposal suggests the use of pot gear, in part, to ensure that fecund females can be released unharmed. However, handling mortality of spiny dogfish is unknown and pot gear has not been tested for this species. It is possible that large mature females may enter the pot and become stuck in the tunnel opening or pot netting in the same way they get stuck in gill nets, causing death.

#### **Background on the federal management of sharks in the GOA:**

The shark complex in the GOA has been managed as a group since 2011. The OFL, ABC, and total allowable catch (TAC) for sharks in the GOA are recommended by the North Pacific Fishery Management Council and established by the Secretary of Commerce on a yearly basis. The TAC has been set equal to ABC since 2011. The OFLs, ABCs, and TACs are GOA wide and not further split out by area. Spiny dogfish are included in the shark complex. There is currently no directed fishing for any shark species in the GOA federal fisheries. The maximum retainable amount of sharks is 20%.





December 22, 2021

Sent via Electronic Mail

Alaska Board of Fisheries  
PO Box 115526  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Alaska Board of Fisheries:

I am writing on behalf of Native Peoples Action, a statewide non-profit organization that strives to give voice to our ancestral imperative to uplift our peoples and our traditional ways of life by taking a stand, working together and mobilizing action. We do this through ensuring Alaska Natives are heard in all levels of policy making, by building stronger unity among Indigenous communities to collectively advocate for the wellness of our peoples and our ways of life, and by transforming social systems. I am also writing on behalf of myself, as a Native woman who grew up in southeast Alaska who grew up eating herring eggs, whose family has been sustained by the herring for thousands of years, who also continues to feed my children herring eggs, and hopes to continue our way of life for future generations.

NPA strongly supports proposals 156, 157, and 158 put forward by the Sitka Tribe that uplifts traditional knowledge in the management system. Indigenous traditional knowledge has been, for too long, ignored by our governing and decision-making bodies. Traditional knowledge has kept the herring thriving for thousands of years, traditional knowledge will keep them thriving for thousands more. NPA opposes proposals 159, 160, 161, 163, 164, and 165. We uplift the voices most impacted and join their concern that these proposals will lead to the decimation of local stocks.



Overfishing and over-utilization by certain permit holders is, unfortunately, not unique to the herring. We have seen and heard communities going hungry and losing traditional sources of protein because of powerful groups that have pitted their income against those who are filling their freezers and continuing on traditional and spiritual ways of life. We ask that the board of fish prioritize subsistence over the cash economies of commercial fisherman, and to please listen to those who are impacted most.

Gunalchéesh/Háw'aa/Quyana/Mahsi'/Baasee'/Maasee'/Dogedinh/Thank you,

*Kendra Kloster*

Kendra Kloster  
Executive Director  
Native Peoples Action



December 22, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> 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 and sport salmon fisheries of the Southeast region. Salmon fishing in the Southeast region is important to me as a food and recreation 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.

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,

Neil Akana  
npakana@hotmail.com  
(907) 747-8960

Submitted By  
Nellie Lipscomb  
Submitted On  
12/22/2021 3:47:00 PM  
Affiliation



PC275  
1 of 1

I am writing in support of Proposals 156, 157, and 158, as these initiatives are important developments towards more effectively and safely managing the commercial herring fishery in Sitka Sound by better protecting population resilience and doing less harm to the subsistence roe-on-branch harvest.

I am opposed to proposals 159, 160, 161, 163, 164, 165, 166 due to their lack of strong, empirically-based scientific justification, notable disrespect for the rights of subsistence users, and disregard for the importance of implementing modern/traditional Tlingit knowledge in any management of this keystone species. These proposals portend significant risk of further damaging the already critically-vulnerable herring population, and contributing to the further marginalization of viable, vital Tlingit knowledge of our environment.

Further, I believe that none of these proposals are sufficiently proactive or strong enough to ensure respectful, ethical, and effective stewardship and protection for future generations of both herring and people.



Submitted By  
Nels Wolf Lynch  
Submitted On  
12/21/2021 9:21:14 PM  
Affiliation  
Permit Owner

Phone  
9077969281  
Email  
[wolfnak13@gmail.com](mailto:wolfnak13@gmail.com)  
Address  
P.O. Box 425  
Haines, Alaska 99827

Hello there,

My name is Nels Lynch and I am writing in to support proposal 163/164 for an equal split fishery for the Sitka Sac Roe Herring Fishery.

I've been involved in the fishery since 2009 when my father Ted Lynch handed the permit down to me, the same permit my grandfather Michael Lynch handed down to him. I am very fortunate to have been included in such a fishery and see the importance it has on our way of life in Alaska and the people involved with it. Being an Alaska Native commercial fisherman and continuing my ancestors legacy while supporting my young family has given me great purpose and pride in my own life.

It seems like the feast or famine mentality and commercial fishing go hand in hand but I feel the best sustainable approach for this fishery is when those involved can come together and make the most of the changing times. I believe the happy medium for those opposed and those involved with the Sitka fishery is an equal split fishery.

Thank you for your time and commitment.

Nels Lynch



Submitted By  
Nicholas Galanin  
Submitted On  
12/10/2021 7:26:14 PM  
Affiliation

Phone  
9077381823

Email  
[galanin@gmail.com](mailto:galanin@gmail.com)

Address  
601 Versa Place  
Sitka, Alaska 99835

I support proposals 156, 157 and 158 and strongly suggest that you do as well. We must protect the herring for future generations. I also oppose proposals 159,160,161,163,164,165.

Gunalchéesh



Submitted By  
Nicole Marie Windhausen  
Submitted On  
12/16/2021 2:29:28 PM  
Affiliation

Phone  
3154147857

Email  
[nicole.marie.windhausen@gmail.com](mailto:nicole.marie.windhausen@gmail.com)

Address  
9  
Bishop Drive  
Fayetteville, New York 13066

I am writing today as a US citizen to express my support of herring proposals: 156, 157, and 158, and oppose proposals 159, 160, 161, 163, 164, 165, and 166.

Nicole Windhausen



Submitted By  
Nina  
Submitted On  
12/22/2021 4:12:37 PM  
Affiliation



PC279  
1 of 1

Hello my name is Nina. Im native and 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.

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



Est. 1955

**North Pacific Fisheries Association**  
**P.O. Box 796 · Homer, AK · 99603**  
**npfahomer@gmail.com**



PC280  
1 of 1

December 21, 2021

RE: Alaska Board of Fisheries Southeast Finfish  
Oppose Proposals 101 & 103

Dear Members of the Alaska Board of Fisheries,

The North Pacific Fisheries Association (NPFA) is a commercial fishing organization based in Homer, Alaska, representing more than 70 family fishing operations utilizing a variety of gear and vessel types. Our members participate in fisheries throughout Alaska, from Southeast to the Bering Sea, in both state and federal waters, and many participate in Prince William Sound (PWS) salmon fisheries. Benefits of the southeast salmon fisheries are felt throughout our community.

**NPFA urges the Alaska Board of Fisheries to oppose Proposals 101 and 103 and continue to allow ADF&G biologists and managers to oversee the State of Alaska PNP Hatchery Program.**

Proposals 101 and 103 would impact how Southeast hatchery management plans and governing statutes are interpreted and implemented. These changes would no doubt influence all hatchery programs through the micromanagement of hatchery operating plans by the Board of Fisheries. These proposals seek to reduce or limit hatchery production through direct action by the Alaska Board of Fisheries and would directly affect all hatchery programs in Alaska and have an immediate impact on sport, personal use, subsistence, and commercial harvests of hatchery fish statewide.

According to the McKinley Research Group, "Southeast hatcheries account for 2,000 jobs (annualized), \$90 million in labor income, and \$237 million in total annual output, including all multiplier effects." The hatchery harvests earned fishermen \$44 million on average annually. This significant economic impact in the region would be devastating to loss. Additionally, hatchery returns are targeted by ADF&G's prosecution of the fishery during years of low wild stock returns.

Alaska's hatchery operators recognize that there are periodically high levels of hatchery straying in some natural stream samples, but the overall fraction of enhanced salmon straying remains low. In 2012, to address questions of straying and a lack of scientific research directed specifically at pink and chum salmon, Alaska's hatchery operators came together with ADF&G and seafood processors to encourage unbiased investigation of hatchery strays and potential resulting hatchery impacts on wild stocks. As a result, the Alaska Hatchery Research Project (AHRP) is an ongoing project that seeks to quantify and assess pink and chum salmon straying in PWS and chum salmon in Southeast Alaska, guided by a series of research questions.

The ongoing research in this area will inform the board in future years. Significantly altering the hatchery program without the resulting information from this research would be short sighted. Again, NPFA asks that the Board oppose proposals 101 and 103.

Thank you for your service and consideration.  
Sincerely,

Malcolm Milne



**NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION**

1308 Sawmill Creek Road  
Sitka, Alaska 99835  
Office: (907) 747-6850 fax: (907) 747-1470



PC281  
1 of 1

December 22, 2021  
Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)  
RE: **Opposition to Proposals 100, 101 & 103**

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

Thank you for the opportunity to comment on Enhancement proposals submitted to the Alaska Board of Fisheries for the SE Alaska and Yakutat board of fish meeting.

I am the General Manager of The Northern Southeast Regional Aquaculture Association or better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement projects. My comments represent our 25 member board, and the fishermen they represent, made up of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and interested persons from our region. Our board has broad representation from our region and at our Fall November 18<sup>th</sup>, 2021, meeting, our 25 member board passed a **unanimous** resolution, with no abstentions, **strongly opposing** Enhancement proposals **101 and 103**. Additionally, our board passed a resolution **opposing** resolution **100** by a super majority of the board.


NSRAA **strongly** encourages the BOF to **oppose** proposals **101 and 103**. Proposals nearly identical to 101 and 103 were submitted for the November 2021 Prince William Sound meeting by the same proposer (Proposals 49-53). At the PWS BOF meeting there was overwhelming opposition to these proposals while the proposer provided no on-time comments, no public testimony and no additional information through deliberations. At the PWS BOF meeting proposal 49 was rejected 0-6 and proposals 50-53 had no action taken. NSRAA asks the board to reject or take no action, as was done at the PWS meeting in Cordova, on these proposals.

Proposals 101 and 103 are punitive in nature and do not attempt to address **any** allocation issue in the SE Alaska area. The proposals, whether intentional or not, would have tremendous financial impacts for ADFG and hatchery operators and result in a reduction and likely elimination of most enhanced salmon production in the region. Additionally, proposals **101 and 103** are **opposed by ADFG** as they are impractical and impossible to implement into management. The proposer behind **100 and 103**, has in the past, submitted proposals targeting a reduction in hatchery production that have not been adopted by the board of fish. These current proposals before you are the latest versions which take up tremendous time by ADFG and BOF staff, hatchery operators, processors, commercial salmon fishermen, and yourselves, the Alaska Board of Fisheries members.

NSRAA also opposes Proposal **100** which would remove gillnet as a legal gear for the SE Cove Terminal Harvest Area (THA). NSRAA supports retaining gillnet as a legal gear in this area to allow maximum flexibility to manage the Terminal Harvest Area common property fisheries through board direction and in consultation with ADFG. To date there has never been a commercial gillnet opening in the SE Cove THA.

Once again thank you for the opportunity to comment and thank you for the work you do on behalf of the subsistence, sport, personal use, and commercial fisheries of the state.

Sincerely,

  
Scott Wagner



Submitted By  
Norval Nelson  
Submitted On  
12/22/2021 2:41:36 PM  
Affiliation

Phone  
907-723-5334

Email  
[norvalnelsonjr@gmail.com](mailto:norvalnelsonjr@gmail.com)

Address  
1625 Fritz Cove Road  
Juneau, Alaska 99801

I am in support of SE Herring proposals 163 and 164.

I have benefitted as a herring seine tender and a hering seine fisher for over 35 years.

I have been a permit holder for over 10 years.

I have been concerned about the polttics which favors "western science" and overlooks traditional ecological knowledge which has been presented by Sitka Tribes of Alaska.

Both user groups want the same thing - that this species be managed in perpetuity for generations to come. A co-op system was implemented in 2020 and perfected as an equal share system in 2021. The equal share system in 2021 was very effective and achieved a safe fishery and management which benefitted both user groups - personal and commercial.



Submitted By  
John Woodruff  
Submitted On  
12/22/2021 10:52:33 AM  
Affiliation  
OBI/Processor

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12069705471  
Email  
[john.woodruff@obiseafoods.com](mailto:john.woodruff@obiseafoods.com)  
Address  
1100 W Ewing Street  
PO Box 70739  
Seattle, Washington 98119

Madame Chairman and Board members;

Please accept this as our written testimony for your upcoming Board meeting regarding Southeast proposals. OBI operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in the Alaska seafood processing business and sustainable salmon stocks are the single most important issue to our long term viability. We employ thousands of workers in Alaska, many locally based, and work with many hundreds of independent harvesters who are mostly State residents. We pay them tens of millions of dollars annually for their catches, much of which stays in their home communities. We also pay millions of dollars annually in State taxes that support local governments, law enforcement, schools, social programs, etc. We have always supported a science based management approach and will continue to do so. We know well the Alaska Department of Fish and Game is second to none in applying scientifically collected data to determine the optimal hatchery contribution toward insuring maximum sustainable yield.

I am writing to support the Alaska non-profit and private hatchery system that operates in Southeast Alaska. These hatchery organizations are; Northern Southeast Regional Aquaculture Corporation, Southern Southeast Regional Aquaculture Corporation, Douglas Island Pink and Chum, Inc., and Armstrong/Keta Inc. and they are an integral and key part of the Southeast Alaska salmon resource and management plan. Their work is exceptionally important to our company and to the coastal communities that dot Southeast Alaska.

We urge you to let the partnership that exists between ADF&G and the various hatchery organizations to continue on its current path and thus reject proposals 101 and 103. We will have representatives at your Ketchikan meeting and plan to testify as well as participate in the committee process.

Sincerely,

**John Woodruff**

*VP – Operations*

**OBI Seafoods LLC**

[John.woodruff@obiseafoods.com](mailto:John.woodruff@obiseafoods.com)

P: (206) 286-5800

1100 W. Ewing ST.

Seattle, WA 98119

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



Alaska Board of Fisheries

PO Box 115526

Juneau, AK 99811-5526

<http://www.boards.adfg.state.ak.us/>

RE: Comments on herring proposals for SE Finfish Meeting--Jan. 4-Jan. 15, 2021

Mr. Chairman and Board Members,

I am writing to express:

Support for proposals 161

Opposition to proposals 156, 157 and 158

Proposal 156, 157 and 158: Oppose

OBI Seafoods opposes these three proposals, as a processor (Icicle now OBI), that has been in the Sitka Sac roe fishery since the beginning. We have seen the ebb and flow of herring from record highs to record lows. We understand the volatility of this fishery. One thing that has been a constant is the Department's determination to do what is right for the herring biomass. Alaska Department of Fish and Game employees are a dedicated team of scientists that have the sole job to scientifically ensure the health of the herring biomass in Sitka and around the State. The department tries to accurately predict the harvestable surplus and overall health of the fishery through dive surveys, sonar mapping and sampling. We feel the department has done an excellent job in maintaining the health of the fishery and we urge the board to follow the science and ignore political pressure.

We have seen similar proposals in previous board cycles, with the same deficiencies fail time and time again. We ask that this board implore the same discerning wisdom that has prevented proposals like these from compromising the science-based integrity of the management strategy regulating this fishery. The current management plan is time-tested, responsive to stock changes, conservative, uses the best available management science, and provides for a subsistence priority while allowing for a commercial fishery on available surpluses. Why change a successful strategy?



The claim that the older fish are at a critical risk as suggested in proposals 157 and 158 is clearly a 'red herring', as the claim isn't supported by verified data. The analysis using age 3-4 year old fish to calculate excessive harvest rates on older fish as noted in Proposal 157 is particularly disingenuous since the younger fish are typically immature and not even available to the fishery. Other contentions that are presented as factual by these proposals, such as fealty to spawning locations, are not backed by observable data and facts. Furthermore, the declaration made in proposals 156 and 157 that subsistence harvesters are unable to "...meet their needs" speaks nothing to the actual statute requirement, which is to provide for "reasonable opportunity", a condition that is clearly being met within the current management strategy.

In Summary, these proposals are rife with inaccurate unsubstantiated statements, and fail to acknowledge the historic genesis of the harvest rate percentage. Similar attempts to corrupt the existing management plan have thankfully been voted down by previous boards, and we would ask the current members to do the same again by taking no action or rejecting these proposals outright.

#### Proposal 161: Support

This proposal would establish a permit or registration system for the harvest of herring roe on branches. Most other subsistence fisheries in Southeast and throughout the state require a permit to operate. Consequently, this would not be a unique situation to require one in Sitka. The roe on branches fishery is constrained only by timing of spawn and effort expended to harvest the product. There is no harvest limit, and no way to account for the amount of product that is being removed from the resource. This proposal would facilitate valuable data collection that could be used to better manage the resource for the benefit of all stakeholder groups.

OBI seafoods ask that you approve this proposal.

Submitted By  
Oliver Price  
Submitted On  
12/22/2021 10:43:26 PM  
Affiliation



PC284  
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 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. The ongoing existence of herring runs and subsistence harvest are incredibly important to myself as someone who's family relied heavily on subsistence harvest in hard times. I believe in this matter and others, that the board of fish should prioritize indigenous knowledge and the rights of subsistence users over the minority concerns of commercial users. Oliver Price





ADF&G, Boards Support Section  
Juneau, AK 99811-5526  
P.O. Box 115526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

Alaska Board of Fisheries  
Attn: Executive Director  
[glenn.haight@alaska.gov](mailto:glenn.haight@alaska.gov)

RE: Second request to schedule consideration of Proposal 282 after March 2022 meetings

Chairman Carlson-Van Dort and Board Members:

In October, the Board accepted an out-of-cycle agenda change request (ACR 7) that asks the Board to restrict salmon fishing in Area M. The Board scheduled its consideration of ACR 7 (now proposal 282) during the March 11-18<sup>th</sup> meeting, which conflicts with the State-water Pacific cod fishery that sees significant participation by Area M salmon fishermen.<sup>1</sup> Because public participation and an opportunity to be heard are essential components to the Board process, **we respectfully ask the Board to reschedule its consideration of Proposal 282 to a later date in March or April that does not conflict with important federal and State Pacific cod fisheries that occur from January through the middle of March.**

The Board of Fisheries process is unique and durable due to its reliance on direct stakeholder participation for an understanding of impacts of proposed actions. While we understand that regular meeting cycles will, at times, conflict with fishing opportunities, the need to ensure public participation by affected parties for *out of cycle* actions is heightened given the short notice upon which ACRs are scheduled. As noted by several Board members and ADF&G staff during the deliberations on ACR 7, issues dealing Area M management are complex and far-reaching. In taking up Proposal 282, it would seem essential then, for the Board to hear from the stakeholders that will be most impacted by any Board action.

Thank you for your consideration,

---

<sup>1</sup> Based on 2021 CFEC data, 80 Area M salmon permit holders also hold State-water Pacific cod permits. Notably, this data does not capture Area M salmon permit holders that participate in the cod fishery as crew.



A handwritten signature in black ink, appearing to read "Shannon Carroll".

Shannon Carroll, Director Fisheries Development & Alaska Public Affairs  
Trident Seafoods

A handwritten signature in blue ink, appearing to read "Abby Fredrick".

Abby Fredrick, Director of Communications  
Silver Bay Seafoods

A handwritten signature in black ink, appearing to read "Chris Barrows".

Chris Barrows, President  
Pacific Seafood Processors Association

Submitted By  
Patricia Roberts Alexander  
Submitted On  
12/22/2021 9:47:29 AM  
Affiliation  
Personal Recommendations



PC286  
1 of 1

**Pat Alexander – December 22, 2021**

**Comments to the Board of Fisheries**

**Proposals 156, 157, 158**

Please vote yes. I strongly support these three proposals of the Sitka Tribe of Alaska.

**Proposal 159 - Repealing 27.159 requiring ADFG to adjust the fishery in time and space to accommodate subsistence needs.**

Please vote no. ADFG has the responsibility to manage the fishery during the in-season harvest to make sure that subsistence harvesters get the Amount Necessary for Subsistence. The actions ADFG takes to achieve the Amount Necessary for Subsistence need to be made known and followed. The loss of the STA lawsuit emphasizes that fact.

The Department needs to find ways to get input from the field as to the quality of the spawn and where it is happening. It should allow subsistence harvesters to share pictures or videos of thickness of the eggs on branches, kelp, or the sea hair to the Sitka Tribe of Alaska's Resource Protection Department head to collect for the ADFG and the public.

It doesn't make sense to me that taking of the herring eggs by subsistence harvest for hundreds of pounds is given negative attention (micro-managing) when the commercial herring sac roe fishery take is by the ton. Why does the industry not have to track where they are selling their products to and how much is waste?

For ADFG to fight like tigers to protect an unsure herring egg market when it has not met the Amount Necessary for Subsistence in a decade is shameful.

To an elder who can remember when the herring egg harvest was so plentiful that it was often 9-12 inches thick, it is heartbreaking to think of the changes. We now have tribal citizens who have not gotten herring eggs in years. It is part of our lifestyle and culture. It nourishes us spiritually and nutritionally.

Please remember the Board of Fish meeting in Sitka where almost a 100 people called for conservation of the herring. Listen to our voices this time.

**Proposal 160 – Shrinking the subsistence only area**

Please vote no. This area needs to remain a herring spawning area. It is close to town and more Natives can access the herring spawn if this protection is in place.

**Proposal 61 - Requiring permits for subsistence harvesters**

Please vote no. Alaska Natives want food sovereignty. In these Covid-19 times the grocery store shelves go bare and we must have the ability to feed our families as stated in the Alaska State Constitution. Long held scientific knowledge of the spawning habits of herring requires quick action. We should not create more barriers to participate.

**Proposal 163 – Allows multiple ac-roe permits on one vessel in an “equal split” quota system**

Please vote no. This could result in more catch and release to get older, bigger fish, causing more of the herring to die when handled by fishermen. The commercial sac roe fishers have fished out whole age classes. The older herring show the younger ones where to spawn where the eggs have the best chance of surviving. The sac roe fishery takes and takes the older fish so the younger herring have no older fish to teach them so they spawn in places where the eggs cannot survive.

**Proposal 164 – Allows permit holder to over-fish quota by 10% one year and then under-fish by 10% the next year.**

Please vote no. This proposal could increase the commercial sac roe fishers take of an already stressed resource.

**Proposal 165 - Allows the unfished herring quota from the normal season to be secured as food or bait from October through February or expand the fishing area to Cape Ommaney.**

Please vote no. This proposal increases pressure on the herring.



December 22, 2021

Board of Fisheries  
Alaska Dept. of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> 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 salmon fisheries of the Southeast region. I have been involved in Native Traditional Fish Camps since I moved to Sitka in 1985. Traditional requirements for salmon run deep in this community. I work in a community that requires salmon to exist for health and well being of all those who live here. Salmon provides vital nutrients to my family and everyone I know in Sitka.

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,

Patricia Dick  
sooktushaa@gmail.com  
(907) 321-1927



Submitted By  
Paul deMontigny  
Submitted On  
12/16/2021 3:26:10 PM  
Affiliation  
Power troll permit holder

Phone  
907-518-4284

Email  
[Pdemon9@gmail.com](mailto:Pdemon9@gmail.com)

Address  
373 Mitkof Hwy  
Petersburg , Alaska 99833

I support Proposal 82. I do not support Proposal 83.



## Dear Board of Fisheries,

My name is Peter Bradley – in recent years I was a resident of Sitka, Alaska.

**I support proposals 156, 157, and 158**, which I think are good initiatives to tune this management paradigm to better promote resilience, abundance, and – hopefully – subsistence availability, within the context of massive opportunity being provided to sac roe seine permit holders.

**I oppose proposals 159, 160, and 161, which** are offensive, baseless, bad faith proposals brought by the industry gear group 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 fish behind 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, and if these proposals are given serious consideration I think it should be without added benefits unrelated to safety considerations (multiple permits on each boat, and allowing the 10% over/under credit).

**I oppose proposals 164, 165, and 233**, which are inappropriate attempts at permit expansion.

I am writing out of continued concern that decision making processes involving herring in Southeast Alaska suffer from misinformation; various patterns of methodological drift between the 1970's and today - not accounted for by the "model" or by departmental assumptions – seem to be driving false narratives about herring population health under the current herring management paradigm.

For the last several years, I've closely studied historic ADFG reports on herring alongside a variety of other herring studies, reports, letters, articles — everything I can find about Pacific Herring from the 19th century on. It's a sort of comparative literature, and this work is an expression of my discomfort with ADFG's epistemic posture and the ways that ADFG systemically undermines indigenous knowledge systems.

As I've become more familiar with the workings of the fishery, I've come to understand that there is a massive discrepancy between the way that ADFG describes the trend of herring abundance in recent decades and the way that local - and long-time egg-on-branch harvesters in particular - perceive and experience it. Those harvesters often describe a general declining trend in herring abundance and availability of quality spawn for roe-on-branch harvest, especially in near-town areas, over the course of the last century.

What ADFG asserts is quite the opposite; their charts indicate a trend towards ever-greater abundance. It can't be overstated how different the ADFG stance is from local observation. This becomes particularly evident through reading scholarship like Herring Synthesis by Tom Thornton et al, listening to elders' testimony-on-tape from the 1997 Board of Fisheries meetings, and hearing what everybody had to say at the 2018 meetings. Few



people that I've discussed this with over the years would claim that the last couple decades have been better than any decade that came before, and yet that's what ADFG says that their data says has happened. In this comment, I will attempt to describe why I believe that the fishery is being managed on a shifting methodological baseline that makes the Department's purported biomass history inappropriate and misleading. In extension of this comment, I will also attach "Fishy Numbers: An Inquiry", which I wrote earlier this year about issues present in ADFG's current sampling protocols which may be resulting in the slaughter of older fish. I will begin by explaining why the biomass chart is important for this fishery, and how it is tied to the harvest control rule and to the Average Unfished Biomass figure. I will then outline several reasons that I believe that inflation has occurred over time in ADFG's assessed abundance of herring in Sitka Sound, namely:

1. Nobody tried to know the approximate total biomass of spawning herring in Sitka Sound until the mid-late 1980's – ADFG's attempts to do so retroactively are based on improper use of available data and should be considered ***unsubstantiated and conjectural***
2. 1970's study focused on specific wintering populations in small areas using hydroacoustic gear; study did not encompass the entire area
3. Sitka Sound sac roe seine fishery rapidly accrued new areas following Limited Entry
4. Management became more obligated to support the value of the fishery with time by helping find more bigger older fish, especially with a) limited entry, b) the 1992 regulatory change, and c) the gradual shift from a luxury product fishery to a volume fishery
5. Survey effort has expanded in time and space
6. Market conditions transformed this from a luxury fishery to a volume fishery
7. Key biological assumptions like fecundity, maturity, and survival have shifted
8. Version Control / Selective Alterations to recent years
9. Technological evolution

In outlining these mischaracterizations inherent to ADFG's historic biomass estimates, what I hope to demonstrate here is this:

ADFG's contemporary narrative about historic biomass levels in Sitka Sound is absolutely lacking in evidence for years prior to 1976, is largely unsubstantiated through the 1980's and 1990's, and is subject to continuous methodological drift through to the present, and AS SUCH:

- The data points referenced by ADFG for many years demonstrate a massive misinterpretation and misrepresentation of available information and fail to account for changes in the goals of the assessment and study over the years as well as for changes in survey area, efficiency, and effort.
- ADFG has systematically failed to exercise intellectual humility at an organizational level and must correct this pattern. It falls on ADFG to properly represent their information so that it can harmonize with the lived reality of the people of the area.
- Herring, especially older herring, are likely being exploited at a higher rate in Sitka Sound than ever before;
- The AUB should be temporarily set at a much higher level – substantially higher than the average estimated biomass of the last 20 years - until such a time as a legitimate new study is completed.
- This body must take the routine failure to reach the Amount Necessary For Subsistence (ANS) seriously and engage with the obvious reality that this fishery has direct impacts on traditional Tlingit harvesting practices which must be prioritized.



## The ADFG Biomass Chart

In 2019, when Alaska Department of Fish and Game was responding in court to Sitka Tribe of Alaska's allegations of mismanagement, ADFG Biometrician Sherri Dressel included the below chart in her affidavit and used it to represent ADFG's narrative about historic herring abundance of Southeast Alaska's Outer Coast. She wrote that the chart indicates that "The combined biomass of Sitka and Craig stocks are at a high level, compared to years since surveys have been conducted (1971), and at an intermediate level, compared to estimates of biomass back to 1926."

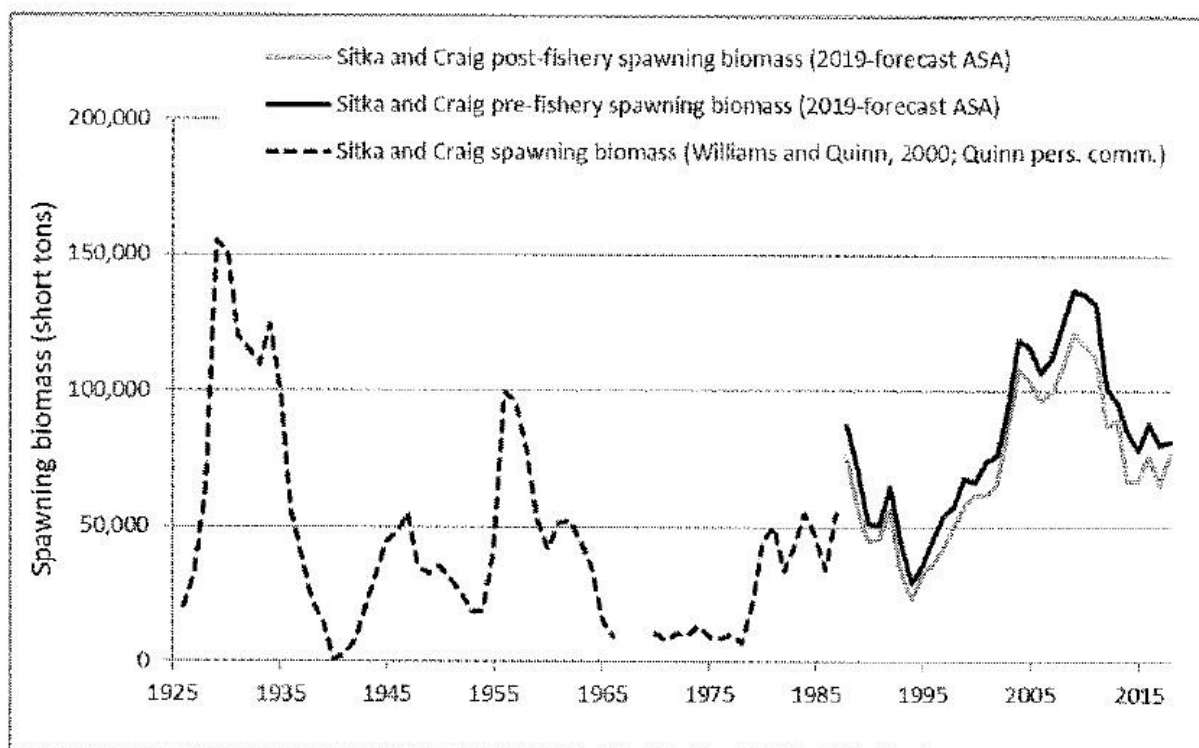


Figure 1 Sitka and Craig Spawning Biomass chart from ADFG Biometrician affidavit, 2019

Presentations of historic abundance such as this have served to delegitimize public outrage about the disappearance of herring populations to seine nets across Southeast Alaska over the course of the last century. This biomass chart serves to mask massive prior abundance and overstates prior population declines.

ADFG has been asserting an unscientific and ahistorical position, and the Department's assessments of historic biomass should not be used as a basis to assume that today's herring populations are healthy.

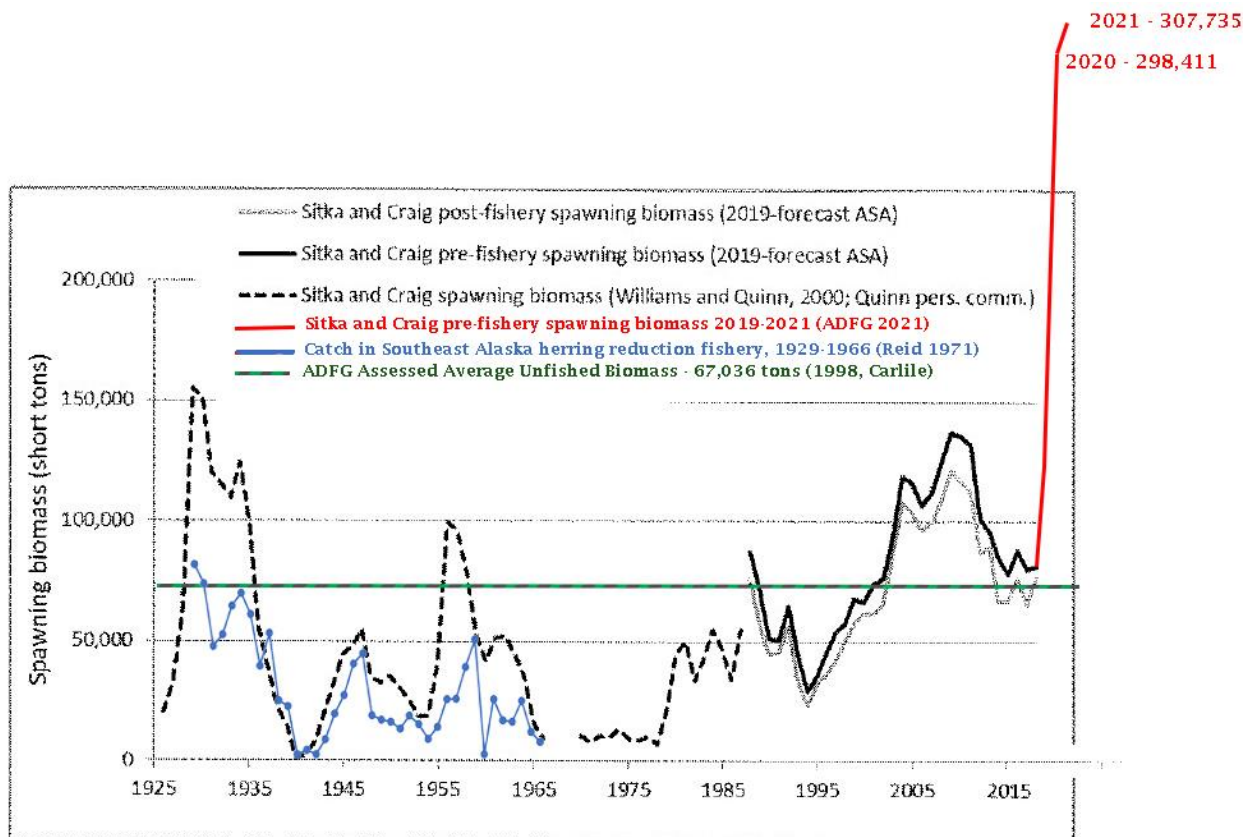


Figure 2: Sitka and Craig Spawning Biomass chart from ADFG Biometrician affidavit, modified to include a) the presumed "Average Unfished Biomass" as it has been set since 1998, b) The catch data in Reid 1971 referenced BY Williams and Quinn 2000, and c) the pre-fishery spawning biomass forecasts for 2020 and 2021 from available ADFG data.

Here is another image of the same chart, but this time I've added a few pieces of information - including ADFG's combined forecast for Sitka and Craig in 2020 and 2021 in red.

**You can see that the chart gets rather silly** with the addition of the two newest data points.

Given the extensive public record on the matter, **it is not credible** that there are thirty times more herring in Sitka Sound now than there were in the 1970's, nor that there are twice the herring now that there have ever been in the last century, nor that the population crashed in 1940, nor that the "Average Unfished Biomass" is reasonably set at a level that has been surpassed every year for 20 years in the course of intensive fishing. The chart betrays an obvious truth: the biomass estimates are inflating with time as the department responds to an expanding mandate by counting herring more thoroughly and efficiently.

Here is the biomass chart as it appeared in 1997, accompanying an ADFG staff note which indicated “The assertions made in this proposal that the Sitka Sound Herring Stock is depleted are not supported by available stock assessment data”. The proposal being considered was a moratorium proposed by STA due to very low herring abundance. The Department has never reported such a low biomass since.

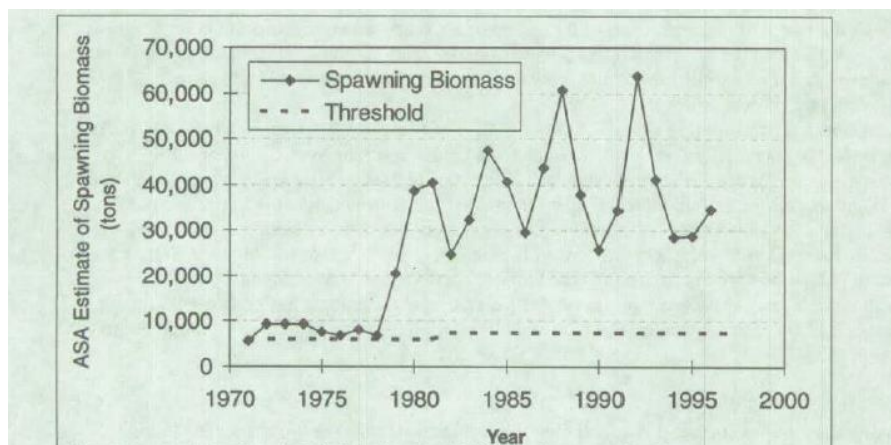


Figure 3 - age structured analysis estimate of Sitka herring spawning biomass, 1971-1996, from 1997 BoF

And here, one more, this from the 2021 pre-season meeting (before the estimates from 2008 and other recent years were significantly boosted):

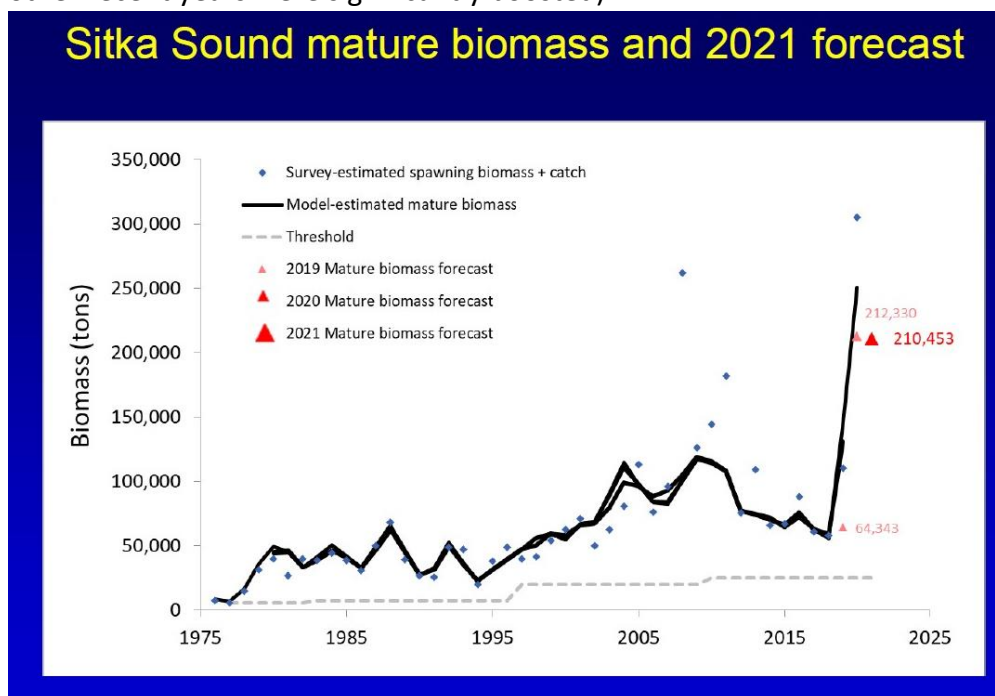


Figure 4 - Sitka Sound mature biomass and 2021 Forecast, from 2021 preseason meeting

## ESTIMATE INFLATION AND THE AVERAGE UNFISHED BIOMASS

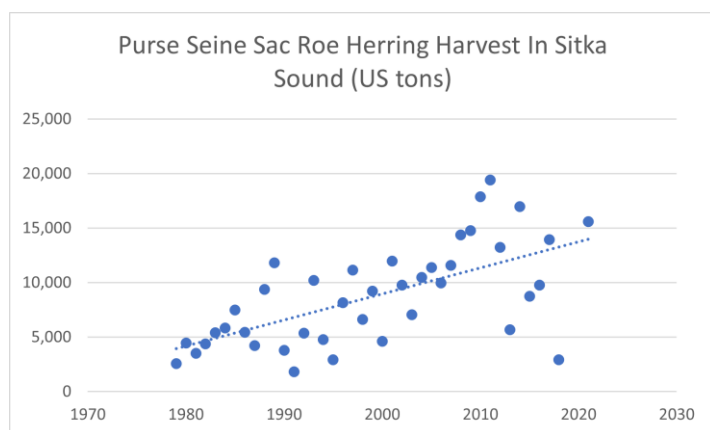
Take another look at chart at Figure 2 from two pages back – the green and black line running horizontally across the chart at 67,036 tons represents the Department’s assumed “Average Unfished (Pristine) Biomass”. The Average Unfished Biomass was determined by the department back in 1998, and was based on a computer model that simulated 2000 years without fishing pressure in Sitka Sound. Dr Dressel explained in her 2019 affidavit:

*“12. In Sitka Sound, the harvest threshold is set at 37% of “pristine” biomass, where “pristine” is estimated as a long-term average of biomass in the absence of fishing and under average environmental conditions, also referred to as long-term average unfished biomass (AUB). Carlile (1998) conducted a simulation and estimated that the AUB for Sitka Sound herring at 67,036 tons based on data from 1971-1996. [...]”*

*19. With the threshold set at 30% of AUB, it no longer made biological sense to have a sliding scale in Sitka as gradual as before (reaching 20% at six times the threshold) because the population would need to be nearly double the average unfished biomass (unlikely to ever happen) before the 20% harvest rate would be reached.”*

Within a few years of 1998, amidst larger fisheries than ever before, ADFG’s annual biomass estimates began to surpass that presumed “pristine” value; the biomass of herring in Sitka Sound has not dipped below the “Average Unfished Biomass” level for the last 20 years. The year after Dressel’s affidavit, the biomass went above 6 times the threshold, which she had just said was unlikely to ever happen. It would be funny if it weren’t such an alarming indication of ADFG’s ongoing biomass inflation. Since the AUB is connected to the harvest rule, the artificially low AUB is serving to allow the fishery to harvest at closer to 20% more often than is appropriate.

All the while, on the strength of rising biomass estimates, the commercial harvest has grown and grown, while subsistence users have complained of the most challenging roe-on-branch harvest years in memory.





## SEVERAL FACTORS BEHIND THE INFLATION OF ADFG'S ESTIMATED ABUNDANCE OVER TIME:

1. Nobody tried to know the approximate total biomass of spawning herring in Sitka Sound for any year before the mid-late 1980's – any notion about total area biomass for years before that is *entirely conjectural and theoretical*

The data through 1970 is derived from catch numbers and the relative strength of individual year classes of herring as determined by catch samples from summer feeding grounds used by the fishery around Southeast Alaska. This data came from different locations across Southeast Alaska at different times, and came from summer feeding grounds rather than spring spawning grounds.

ADFG's attempt to chart biomass for years where they have no data results in some extraordinary misrepresentations in specific years. ADFG reports that in 1926, herring were at a very low ebb; in fact, Sitka herring were likely in near-pristine condition at that time and that point can be attributed to misuse of data. In 1940, ADFG reports that there was a total collapse in the Sitka & Craig Spawning population; there was no collapse that year in Sitka, and in fact USFW biologist Lawrence Kolloen reported a heavy spawning event which some in Sitka thought was the best in 5-6 years. The data for the 1950's and 1960's is artificially low because of the crash in the market for herring reduction products. All available evidence suggests that herring populations were higher in the 1960's than ADFG's flawed history suggests (in the late 1960's, for instance, Management Biologist Jim Parker wrote each year of a good spawning event in Sitka Sound), and that the population wasn't nearly so close to collapse as ADFG now claims for that time.

From 1971 through the early-1980's, biomass numbers are principally derived from hydroacoustic surveys and should be understood as MINIMUM biomass numbers of specific wintering populations within Sitka Sound, not as biomass estimates of the entire spawning population in Sitka Sound.

All of this is important because ADFG's Age Structured Analysis model for Sitka Sound herring is built on the rotten foundation of lousy, over-extended data from the 1920's to the 1980's.

2. 1970's numbers are derived from limited hydroacoustic estimates:

The ADFG herring research program was launched in 1969. For the first several years of the program, the fishery was allocated a 10% harvest level from specific wintering populations of herring – in Sitka, the study and fishery centered around the wintering herring in Katlian Bay.

The history of this fishery demonstrates that for most of the 1970's Katlian Bay was the core research and fishing area in Sitka Sound, and that the expansion to the much larger Sitka Sound area has occurred steadily with time. While present elsewhere in Sitka Sound, herring populations were not surveyed outside of the Katlian Bay area until 1978.

ADFG was focusing on Katlian as part of the "Gear-development" stage of their nascent study. Katlian Bay offered one of several "known wintering concentrations" of herring across Southeast Alaska, study of which would allow for a cautious and humble approach to development of the new fishery. The fishery was allocated



10% of the highest wintertime hydroacoustic survey at Katlian. ADFG wanted year by year comparisons of what they saw as a local or wintering stock: "While the acoustic techniques theoretically provide estimates of absolute population size, the principal need at this stage is for a relative index of population magnitude for annual comparison, Most fisheries are managed by relative rather than absolute indices. The major emphasis on future surveys must be to expend the necessary survey effort to obtain sufficiently precise estimates for year to year comparisons."<sup>1</sup> In 1978, ADFG staffer Dennis Blankenblecker wrote: "Biomass assessments which are conducted by the Alaska Department of Fish and Game (ADF&G) on major stocks do not account for small discrete stocks found in most of Southeastern bays."<sup>2</sup>

There are a few important things to note about hydroacoustics

- Through the 1970's, any aerial surveying and spawn deposition surveying was designed as a groundtruthing of hydro-acoustic estimates and - as advised in ADFG research reports in those times - should not be taken as comprehensive.
- The numbers cited nowadays as the "biomass" of herring in Sitka Sound for 1970's years was derived from the single largest survey of that year. Put another way, the biomass number for those years refers to how many herring were identified in a 1 square mile area in a 1-2 hour period. This reflects a minimum possible biomass of herring in Sitka Sound
- Further - there were many shortcomings for hydroacoustic studies, which is why they were phased out. These shortcomings were commonly referred to in ADFG research reports, and include the following:
  - Hydroacoustic technology was not able to measure herring in the shallows.
  - Hydroacoustic studies worked better at night to avoid tape saturation in the daytime when herring were deeper
  - The accuracy of hydroacoustics declined past a certain saturation point
  - Hydroacoustics were labor and time intensive.
- It is easy to see how each of the above listed factors would contribute to a minimization of biomass numbers for those years. The most important effect is that hydroacoustic studies provided a number that was the MINIMUM known biomass of herring in Sitka Sound. Nowadays, spawn deposition and ASA models provide a guess at the ABSOLUTE biomass of herring. The numbers which result from these vastly different approaches are not suitable for comparison.

When I have brought up this issue in the past, the department has denied that reliance on hydroacoustic studies continued for as long as it did. The 1980 staff report to the Board of Fisheries confirms it: "Egg deposition surveys were not attempted in Sitka Sound, due to lack of time, however, aerial spawning surveys verified that the acoustical biomass estimate of 79 million pounds was "in the ballpark."<sup>3</sup>

### 3. The Sitka Sound sac roe herring fishery rapidly accrued new areas following Limited Entry in 1978

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<sup>1</sup> Assessment of Southeastern Alaska Herring Stocks Using Hydroacoustical Techniques 1970-1971

<sup>2</sup> Blankenblecker, 1978 Report to the Board of Fisheries Southeastern Herring

<sup>3</sup> Staff comment to Board of Fisheries, 1980



Katlan Bay wasn't the only place where herring were milling and spawning in Sitka Sound in the 1970's, and all documentation available – including Herring Synthesis, contemporary news articles, and legacy ADFG reports - establish clearly that there were other unstudied herring in other areas of what is now considered the Sitka Sound area.

However, until Limited Entry went through, management of the sac roe fishery was not practicable except on a very small scale. Limited Entry happened in 1978, which was also the first year that the fishery occurred outside of Katlian Bay - It occurred in Eastern Channel with a very conservative quota to account for the fact that the herring population in Eastern Channel was not being surveyed or researched at the time.

This excerpt from the Sitka Sentinel from April 1978 tells the story of what was going on:

*"Earlier in the season Department of Fish and Game research biologists, using **electronic hydro-acoustical gear**, had made a population estimate of 29 million pounds of herring in the **area of Sitka Sound west of the bridge**. This was the **largest specific wintering population estimate** made in Southeast Alaska since this research began in 1969. Jim Parker, commercial fisheries management biologist for the Sitka area, noted that the Department is **committed in the management of these sac roe fisheries to minimize the harvest of immature herring and to not open these fisheries until at least a 10 percent mature sac roe can be obtained in the harvest**. Test fishing in the area west of the bridge showed that a large percentage of the herring population consisted of immature fish and samples showed that the percentage of the mature sac roe recovery would not reach ten percent. This situation persisted until after spawning began and therefore **no fishery was allowed** in the area west of the bridge. If test fishing had shown that mature herring with an acceptable recovery of mature sac roe could be obtained, a fishery near the 10 percent harvest level of about 1,450 tons, would have been possible this year. On the east side of Sitka Sound test fishing samples showed a large proportion of mature fish and a possible mature sac roe recovery of 11 percent. However, **because it is not known** whether the herring on the east side are a **separate spawning stock, only a small portion of this area was opened** to commercial fishing. **This restricted fishing area included only half of the area where schools of herring were observed along the beaches from aerial surveys.**"<sup>4</sup>*

In 1979, partially on the strength of a good recruit class, the research area was expanded to extend up to Goddard, an area which seiners had been clamoring to get to for a few years at that point. At the 1977 BoF meeting, Southeast Alaska Seine Boat Owners and Operators had said of Goddard area:

*"There is no herring fishing in this area for bait or food. There are winter stocks that have never been surveyed since statehood and should be surveyed and utilized."<sup>5</sup>*

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<sup>4</sup> Sitka Sentinel, Herring Sac Roe Fishery In Sitka Nets 250 Tons, April 19, 1978.

<sup>5</sup> Board of Fish Proposals 212, 213, December 1977, Anchorage.



As the years went on, more and more areas were tacked on to the fishery. Much of this area expansion happened during cooperative fishing years when the seiners could go free-range fishing and scout previously underexplored areas. On a number of occasions, the Board of Fisheries as voted to officially expand the area for the Sitka Sound herring fishery AFTER sac roe fishing has occurred in those areas under emergency orders in cooperative seasons. With time, the area has steadily grown to include locations like Silver Bay, Deep Inlet, Goddard, Windy Passage, Necker Bay, and Crawfish Inlet to the South, Kruzof Island to the West, and Krestof Sound, Nakwasina Sound, and Salisbury Sound to the north. Each of those areas is studied much more intensively now than in the first decades of the sac roe fishery.

These expansions did not happen because herring suddenly moved or expanded to those places - there is ample evidence that these areas often hosted herring spawning events unaccounted for in ADFG's earlier records.

#### 4. Management became more obligated to support the value of the fishery with time by helping find bigger older fish

The following regulation, ***Management guidelines for commercial herring sac roe fisheries (5 AAC 27.059)***, was put into place in 1992, entrenching a symbiotic relationship between ADFG and the commercial fishery; it reads:

*(a) If the department has adequate information, and if department management programs are in place, the department may manage commercial herring sac roe fisheries, to enhance the value of the landed product as follows:*

*(1) fishing periods may be established by emergency order in areas and during times when sampling has demonstrated, or when other factors indicate, that the herring roe content of the catch is likely to be highest;*

*(2) fishing periods may be established by emergency order in areas and during times when sampling has demonstrated, or when other factors indicate, that the catch is composed of the maximum average size of herring available for the stock;*

*(3) in a preseason management plan, the department shall specify the particular herring fisheries that are to be managed to enhance the value of the landed product.*

*(b) The department may modify herring sac roe fishing periods and areas to minimize the harvest of recruit-sized herring during the conduct of a sac roe fishery that targets post-recruit herring.*

This regulation in effect gave ADFG staff a new mandate to aid and assist in search efforts for higher value concentrations of herring in the area, bringing all of the power and authority of the Department into the effort to find, count, and fish herring in Sitka Sound. A natural effect of this regulation is that more and more herring have been identified for the fishery ever since.





## 5. Survey Effort Has Expanded in Time and Space

ADFG reports demonstrate that aerial surveying has expanded dramatically – nowadays, there are daily survey flights and the far reaches of the area (like Crawfish Inlet and Necker Bay, Kruzof shoreline, and Salisbury Sound) are being checked for spawn every few days. There was a time where those areas weren't visited by flights at all, and then there was a time when they were checked just a few times in a season. Every ADFG report through the 1980's contains warnings not to draw conclusions from the data as if it is comprehensive.

Other survey expansions have also occurred in that time. ADFG is now diving deeper to count eggs than was true prior to the 2000's – in 1999, ADFG regs prohibited their divers from diving below 15m of water to count eggs. A major proportion of the high egg counts in 2008, 2019, and 2020 came from the deep, heavy spawn deposition along the South and West Kruzof shorelines. Personal correspondence with Kyle Hebert established that the Kruzof Island transects which allowed for those surveys a) only happened because diving conditions were perfect on the scheduled days and b) included large egg counts from below the historic dive-depth cut-off.

Every mile of spawn that gets spotted, and every additional degree of spawning depth which is measured, contributes to a higher biomass. Increased survey intensity contributes directly to biomass inflation over time.

## 6. Prices transformed this from a luxury fishery to a volume fishery

In earlier years of this fishery, prices for sac roe were quite good. In more recent years, the prices aren't so good. To yield profit, this fishery has transitioned gradually into being a volume/margin fishery rather than a small-scale fishery with a luxury product. These other changes – expanding the area, counting eggs more intensely, surveying more frequently, and a management obligation to “enhance the value” – have happened in service of adapting to the market demands of the fishery.

## 7. Fecundity and survival assumptions have changed

There have been a number of massive changes in the assumptions made by the Department in their modeling of herring over the years. One such change is a shift that took place in 2006 regarding annual survival estimates for herring. For all years before 2006, the Department assumes a 50% survival rate for every age class, every year. For all years since 2006, the Department assumes a 75% survival rate for every age class, every year. That means more of the herring represented by the prior year's spawn deposition survey are now expected to be alive and available for the fishery than is true for years before 2006.

Fecundity assumptions, which have a massive bearing on biomass estimates, have also been changed periodically when convenient for the Department. This has been done 4 or 5 times in the life of this fishery, but has not been done since 2005.



## 8. Version Control / Selective Alteration of Prior Data - ADFG has dramatically raised numbers for recent years of study but has never dramatically raised numbers for prior phases of study

Since launching the ASA model, ADFG has received criticism for “version control” – the Department has done an awful job of tracking and explaining the adjustments that the model has made to the Department’s numbers.

The most recent example of that appears in *Fishery Management Report no21-23: Southeast Alaska–Yakutat Management Area Herring Fisheries Management Report, 2017–2020*. It appears from the biomass charts on p37 of that document that ADFG is now prepared to nearly **\*\*triple\*\*** their prior biomass estimate for the year 2008 from 87,715 tons to what appears to be something in the vicinity of 240,000 tons. This change is happening because the high egg estimate in 2008 was initially rejected by the model as unrealistic, but now that similarly high egg counts have taken place in 2019 and 2020, the model is more accepting of historic high counts on egg deposition surveys. It appears that the model is effectively being trained to accept higher and higher survey amounts over time, but because survey effort and intensity were so low in the 1980’s, the model will never substantially adjust those older figures.

## 9. Technological Evolution

Technology shifts have made massive change to the thoroughness of research and fishing efforts — echo-sounders, more powerful skiffs, spotter planes, etc. One study suggests that fishing fleet power doubles every 35 years, and we can see that echoed in the history of the herring fishery.<sup>6</sup> Given the growing role of the fleet in contributing to surveying and sampling over the years, the same assumption should be made about a doubling in surveying power.

## CONCLUSION

I offer this comment today because I believe that the modern research and fishing program in Sitka Sound is dangerous. The vast cultural, nutritional, and ecological importance of Pacific Herring cannot be overstated, nor can be the long story of sorrowful consequences for those causes in locations up and down the coast due to decades of chronic overfishing.

Management practices have not been respectful of subsistence users. A review of recent history makes it clear that the observations, testimonies, and needs of entities like Sitka Tribe of Alaska and the Central Council of Tlingit and Haida, and the individuals and communities who they represent, have been shunted aside in favor of a symbiotic relationship between Alaska Department of Fish and Game and the purse seine sac-roe herring permit holders.

The modern biomass graph presents a very convincing case for healthy stocks, but the conclusion it proposes is falsely premised. In the three decades since ADFG began presuming to know the biomass of herring in Sitka, the Departmental approach to information has led to a false impression of extraordinary contemporary abundance relative to the last century. This false impression has been at the heart of all Board of Fisheries decisions about Sitka Sound herring in that time and has influenced a 20-year series

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<sup>6</sup> *Maria L. D. Palomares and Daniel Pauly* . On the creeping increase of vessels’ fishing power. <https://www.ecologyandsociety.org/vol24/iss3/art31/ES-2019-11136.pdf>



of the most intensive harvests of herring in Sitka Sound on record. These intensive harvests have harmed subsistence users.

The research model has in some regards come a long way from the experimental management of the 1960's, 1970's, and 1980's. For those years, we have a lost history; we shouldn't pretend to know the biomass of herring in those years in "Sitka Sound". This is because the survey sets have changed and the data isn't calibrated, the results haven't always been directed towards the same purposes, important details have been lost to time, and much of this has happened in experimental terms. It is not appropriate for the department to use this data to make year-to-year comparisons.

It's still a new science, this counting of fish in the sea; we don't know much and we don't know what we don't know. What we know is this: the catch of this fishery has trended up and up and up over the years as surveys have located more fish.

It lies with the department to evolve its stance to make room for the truth of the local experience of the disappearance of herring from near-town areas, and it lies with you to confront the ongoing expansion of this commercial sac roe herring fishery in Sitka Sound by taking serious measures towards conservation and subsistence prioritization this cycle.

Thank you for your consideration.

Regards,

Peter Bradley

P.S. [Attached here is "Fishy Numbers"](#), an inquiry responding to the unusually poor-quality information which ADFG utilized as the basis for allowing record-high GHs in 2020 and 2021. I fully expected that the department would release 2021 survey results in time for this public comment period, and I regret that because that information is still unavailable I haven't had an opportunity to update the document with new information.



# fishy numbers : high herring harvest levels in Sitka Sound built on misuse of data

[By: Peter Bradley](#)

*The 2021 Sitka sac roe herring fishery was allocated a massive “Guideline Harvest Level” on the strength of low quality data, and the disproportionate slaughter of older herring likely resulted. A lack of elder herring is bad news for herring and humans alike.*

*This article is an exploration of apparent implications of ADFG’s decision to arbitrarily base assumptions for the 2021 fishery on outdated weight-at-age and fecundity information. What does it mean if the herring are smaller-at-age than ADFG has assumed, and is it likely that that’s the case?*

*[This is a modified version of “Fishy Numbers: An Inquiry”, originally posted on March 28, 2021.](#) It has been shortened and reorganized for clarity. The original version includes more charts and details in case you’re looking for more background after reading this.*

## Introduction

I am writing this to raise pressing questions about certain elements of ADFG’s arcane herring management methodology as it applied to this year’s fishery. This year, ADFG authorized an aggressive “Guideline Harvest Level” (GHL) based on poor quality information. Management approaches to the 2021 fishery — permissible via current regulations — represented unacceptable risk to population resilience.

My concerns relate significantly to a regulatory deficiency identified by Sitka Tribe of Alaska in Proposal 157, which is up for consideration at the 2021–22 BoF meeting in Ketchikan (Jan 4–16, 2022):

**From Proposal 157 (Sitka Tribe of Alaska):** Theoretically, under current regulations, the entire guideline harvest level (GHL), or even 100% of the older population, could be taken with the largest most fecund herring leaving few large fish to spawn, if the fishery was efficient when selectively harvesting large herring. This is an obvious, unintended deficiency in the current regulation.

My concerns also go beyond this obvious regulatory deficiency; I find that ADFG’s model has not been fed data of adequate timeliness and quality at a time when population dynamics are unusual. [There’s a data science term for what happens in these situations: “garbage in, garbage out”](#). This year, the situation — combining deficient regulations with garbage data and a lack of historic perspective — was unusual and risky enough that some scrutiny of ADFG herring management and modeling is necessary.



What I'm worried about is that *if* age-5 herring came in smaller than arbitrarily forecast at 109g, *and if* the average herring catch did indeed suit the market desire for 110g herring, then that means that a disproportionate chunk of the catch was from ages 6 and above, and those age classes could be nearly decimated.

In this piece, I will:

- outline the elements of the forecast which defined the 2021 Sitka Sound sac roe herring fishery
- explain how the department forms assumptions, determinations, and forecasts around biomass, population structure, and fecundity
- describe why *this year's* forecast was *unusually* speculative, and will point to in-season management implications of erroneous forecasts
- share some of the signals in current and historic data which indicate that this year's assumptions and forecast may have been off mark, with major implications for herring age structure in Sitka Sound for years to come [\[for now, the initial version of Fishy Numbers has a little more of this context than this version does\]](#)
- refer to the most recent information provided by the Department, much of it from the March 12, 2021 [Sitka Herring Informational Meeting](#), including the "[Sitka Sound Herring Forecasts 2020+2021](#)" presentation by ADFG biometrician Dr. Sherri Dressel, the "[ADF&G Herring Survey and Sampling Results 2019 and 2020](#)" presentation by Kyle Hebert, along with the [recent Stock Assessment Surveys](#) including the [2019 Stock Assessment Surveys](#), and [ADFG's map set of observed nautical miles of spawn in Sitka Sound dating back to 1964](#).

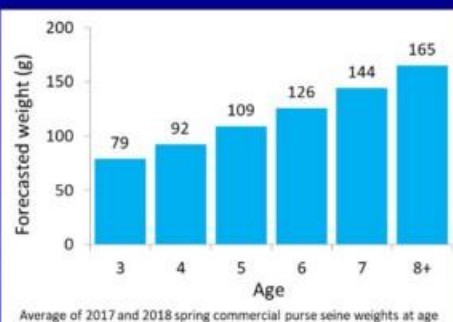
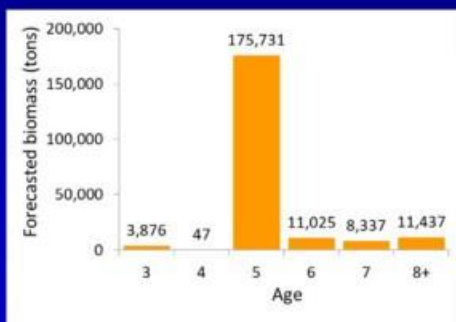
## The Forecast

## 2021 forecast biomass and weight at age

2021 Forecast = 210,453 tons

GHL = 33,304 tons

Forecast average weight = 112 grams



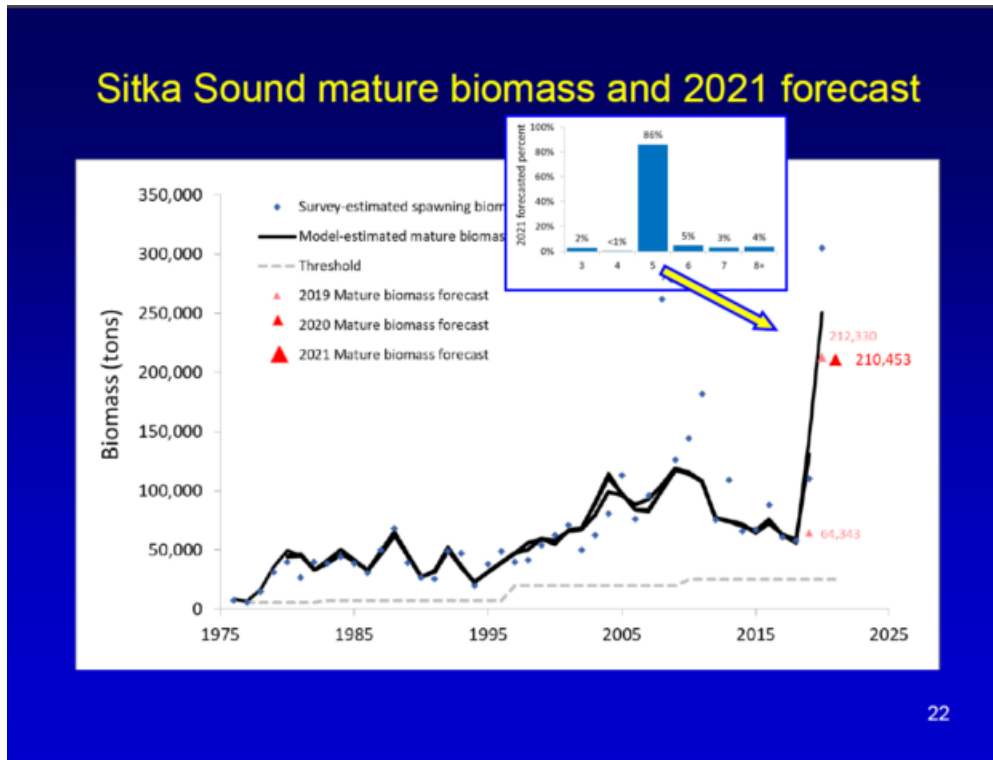
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The slide to the left with heading “2021 forecast biomass and weight at age” was shown on March 12, 2021 at the [Sitka Herring Informational Meeting](#).

It represents the departmental forecast for the 2021 Sitka Sound Sac Roe fishery, and indicates that:

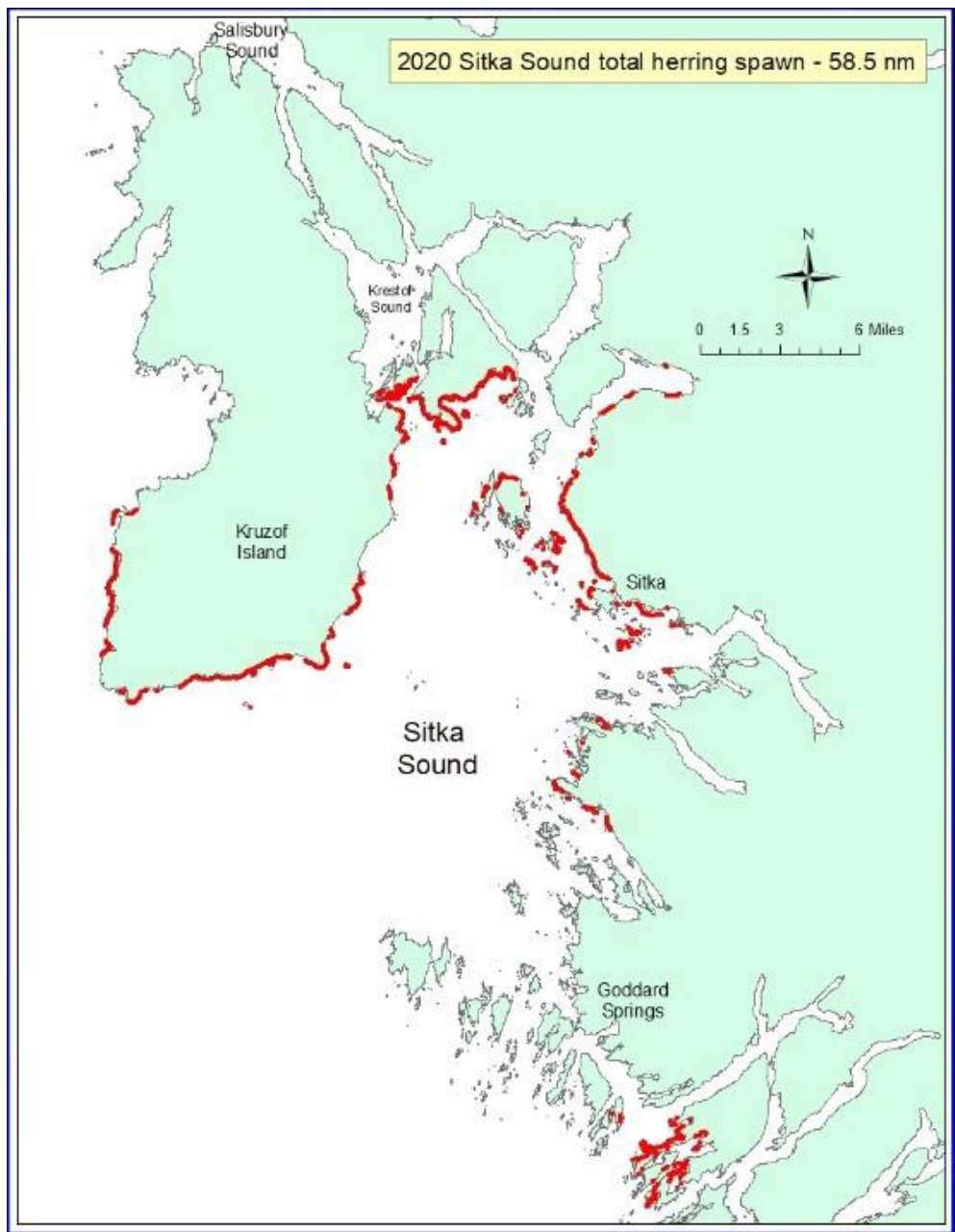
- A forecast **210,453 tons** of mature (age 3+) herring would be spawning in Sitka Sound in Spring 2021. That’s among the very highest ADFG estimates ever.
- Given the high biomass, the “Guideline Harvest Level” — the maximum amount of herring available for the sac roe seine fishery, at 20% of biomass — would be a record high **33,304 tons**. *[Ultimately the fishery brought in 16,000 tons— an immensity, even at half the GHL— of the largest herring they could locate.]*
- The vast majority (175,731 tons) of Sitka Sound herring would be age-5, with lower numbers of age 6–15+ herring (30,799 tons combined) and very low numbers (3,923 tons combined) of age 3+4 herring. While dominant age cohorts of herring can occur rarely does one cohort represent nearly 90% of the population at age-5.
- That the forecast average weight of mature herring would be 112 grams. (It was established in advance of the fishery that the market needed herring hauls averaging 110g or above.)
- That those age-5 herring would weigh, on average, 109 grams. That forecast is highly problematic, given the caption that it is based not on any observation of the fish in question but instead on an “Average of 2017 and 2018 spring commercial purse seine weights at age”. I believe that the best available evidence in advance of the fishery suggested that the age-5 herring would be smaller than that, averaging well below market needs.

# Three Process Problems with the Forecast



An intensely misleading chart depicting ADFG estimate of Sitka Sound herring population biomass over time. Survey area, intensity, efficiency, and rationale has changed dramatically.

The biomass forecast (at 210,453 tons going into the 2021 season) is arrived at indirectly; the foundation of the estimate is (now) the estimated herring egg deposition in Sitka Sound. A total egg deposition estimate for Sitka Sound is arrived at by tracking spawning in the area daily via aerial surveys and then conducting dive samples assessing egg deposition at intervals along areas where spawning was seen.







### Sitka Sound herring spawn metrics (last 10 years)

| Year    | spawn mileage (nm) | mean transect length (m) | spawn area (m <sup>2</sup> ) | egg density (eggs/m <sup>2</sup> ) | total egg deposition (trillions) |
|---------|--------------------|--------------------------|------------------------------|------------------------------------|----------------------------------|
| 2011    | 78.3               | 79.4                     | 11,513,921                   | 1,021,360                          | 13.067                           |
| 2012    | 55.9               | 61.1                     | 6,325,487                    | 708,533                            | 4.980                            |
| 2013    | 61.3               | 76.0                     | 8,629,698                    | 852,680                            | 8.330                            |
| 2014    | 50.0               | 62.5                     | 5,784,311                    | 616,221                            | 3.960                            |
| 2015    | 87.9               | 43.9                     | 7,142,409                    | 578,850                            | 4.594                            |
| 2016    | 63.3               | 80.4                     | 9,428,167                    | 592,993                            | 5.979                            |
| 2017    | 62.3               | 48.7                     | 5,810,652                    | 508,433                            | 3.618                            |
| 2018    | 33.1               | 94.4                     | 5,540,258                    | 692,405                            | 4.216                            |
| 2019    | 55.8               | 90.0                     | 9,339,573                    | 737,051                            | 8.195                            |
| 2020    | 58.5               | 145.5                    | 12,984,592                   | 1,598,671                          | 23.065                           |
| Average | 60.9               | 70.7                     | 7,723,831                    | 700,947                            | 6.326                            |

Newest data point for ASA model

9

In 2020, ADFG reported 58.5 nautical miles of spawning, and from their dive surveys along those miles, determined that there were 23 trillion eggs in Sitka Sound- more than the department has ever registered before. This metric is highly dependent on survey effort, efficiency, and area; each parameter has increased steadily over the last 50 years.

*Problem 1: Egg deposition surveys in Sitka Sound have become more extensive and thorough as the years have gone on, making older biomass estimates appear low. Historic biomass numbers should be considered unsuitable for comparison. The newest example of the ever-expanding survey area is Outer Kruzof; Outer Kruzof wasn't considered to be within the scope of the survey area 25 years ago. Additionally, a great proportion of which were counted at depths that the department wouldn't have dived to in previous generations of study.*

From a count of 23 trillion eggs, it is with a combination of surveying, deduction and conjecture that the age structure and biomass of fish required to produce those eggs.

The Department collects age/weight/length samples that establish **weight-at-age** (size on average for each age-class) and **proportion-at-age** (what proportion of the biomass consists of the different age classes).



Table 10.—Summary of age, weight, and length for the Sitka Sound herring stock in 2015–16.

| Gear type/season                | Parameter                   | Age Category |      |       |       |       |       | Total |
|---------------------------------|-----------------------------|--------------|------|-------|-------|-------|-------|-------|
|                                 |                             | 3            | 4    | 5     | 6     | 7     | 8+    |       |
| survey cast net—spring          | number of fish              | 12           | 429  | 18    | 39    | 6     | 26    | 530   |
|                                 | percent age composition     | 2%           | 81%  | 3%    | 7%    | 1%    | 5%    | 100%  |
|                                 | average weight (g)          | 57.6         | 83.6 | 90.3  | 112.3 | 106.1 | 153.2 | 100.5 |
|                                 | standard dev. of weight (g) | 10.9         | 14.0 | 18.2  | 22.9  | 33.4  | 18.6  | 19.7  |
|                                 | average length (mm)         | 170          | 190  | 195   | 208   | 210   | 235   | 201   |
|                                 | std. dev. of length (mm)    | 8.2          | 7.9  | 9.5   | 11.2  | 302   | 17.4  | 10.3  |
| commercial purse seine—spring   | number of fish              | 9            | 392  | 19    | 68    | 10    | 27    | 525   |
|                                 | percent age composition     | 17%          | 2%   | 24%   | 8%    | 9%    | 40%   | 100%  |
|                                 | average weight (g)          | 64.2         | 94.9 | 104.2 | 132.5 | 148.6 | 178.5 | 120.5 |
|                                 | standard dev. of weight (g) | 8.4          | 14.3 | 17.7  | 22.7  | 28.0  | 28.9  | 20.0  |
|                                 | average length (mm)         | 170          | 193  | 200   | 213   | 218   | 236   | 205   |
|                                 | std. dev. of length (mm)    | 4.1          | 8.4  | 9.3   | 11.0  | 13.4  | 12.7  | 9.8   |
| test fishery purse seine—winter | number of fish              | 12           | 393  | 27    | 55    | 15    | 19    | 521   |
|                                 | percent age composition     | 2%           | 75%  | 5%    | 11%   | 3%    | 4%    | 100%  |
|                                 | average weight (g)          | 67.5         | 88.0 | 98.6  | 123.8 | 140.3 | 171.4 | 114.9 |
|                                 | standard dev. of weight (g) | 16.5         | 12.8 | 16.8  | 23.1  | 36.4  | 19.3  | 20.8  |
|                                 | average length (mm)         | 172          | 190  | 197   | 209   | 217   | 238   | 204   |
|                                 | std. dev. of length (mm)    | 12.2         | 8.3  | 11.8  | 12.9  | 18.0  | 11.0  | 12.4  |

The most recent example of a Stock Assessment Survey using three sample methods, from 2015–2016.

For several years ending in 2016, that data was collected using three different methods of sampling herring each year: active spawning cast nets, commercial seining in the spring, and a purse seine test fishery in winter.

*Problem 2: The winter test fisheries have been dropped since 2015–2016, and an over-reliance on data from the selective commercial fishery has resulted. Winter test fishing has not happened since 2015–16, in 2019/2020 there were no commercial fishery data to reference. Despite survey bias and selectivity problems, the department has favored data generated by the commercial fishery in recent years.*

*After becoming aware of a massive incoming age class in 2019, the Department made the unusual decision to base the forecasts for 2020 and 2021 on weight-at-age samples collected in the commercial fishery back in 2017 and 2018, rather than using the cast net samples which indicate herring which could be rather smaller than the forecast.*

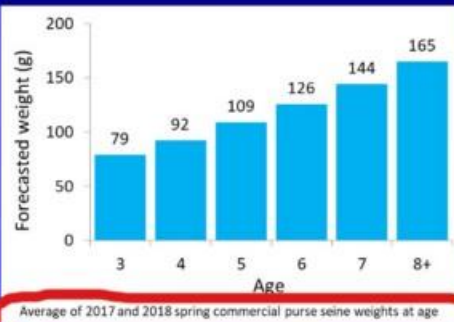
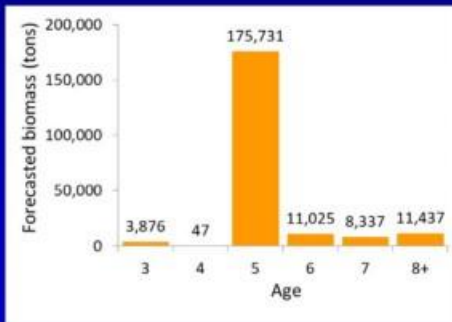


## 2021 forecast biomass and weight at age

2021 Forecast = 210,453 tons

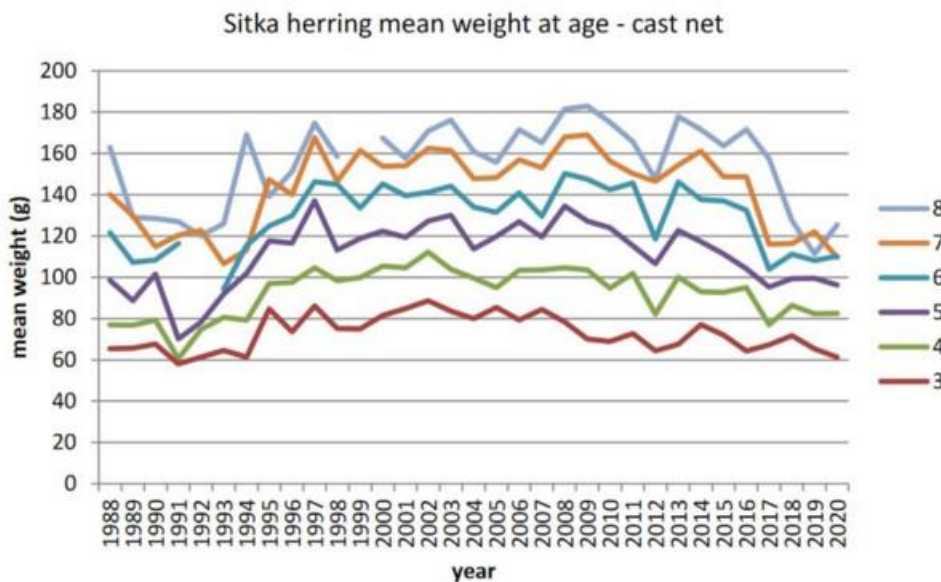
GHF = 33,304 tons

Forecast average weight = 112 grams



Average of 2017 and 2018 spring commercial purse seine weights at age

Once the Department has information on age-class proportions and average weight-at-age, ADFG needs a framework to determine the *fecundity:weight* relationships which describe how many eggs a herring of a certain size will carry.





## **ADFG has not done a new fecundity study or changed the weight:fecundity relationship since 2005.**

Before that, there were studies in 1971, 1988/89, 1996, 1998. The results were substantially different each time.

In 2005, there was a diverse age structure with a generally high condition factor (bigger fish). Now, all ages are coming in small and the population is dominated by one age group.

*Problem 3: Using that data as a key point in extrapolating biomass is sort of like budgeting a road trip using the 2005 price of fuel. Some years it'll match up, some years it won't.*

*At one time, the goal for the fecundity study was to “promote estimates of fecundity-at-weight at the extremes of the weight range that are within +/- 30% of the predicted fecundity, 90% of the time”. In how many years between 2005 and now has that goal been achieved? We have no way of knowing.*

And so that is how the biomass is reached — by counting eggs using ever shifting methodology, sampling herring using ever shifting methodology, maintaining a static assumption about herring fecundity from 2005, and running it all through a computerized model that assumes it has all of the information it needs.

### ***Recap: How the biomass is determined:***

*Step 1. Estimate the number of eggs in Sitka Sound through aerial surveys and follow-up dives to assess egg deposition. [Problem 1: survey effort and efficiency has increased with time, and ADFG dives deeper and has flown surveys on more days across a wider area as the years have gone on]*

*Step 2. Sample herring to figure out age composition and weight-at-age using one or more methods. [Problem 2: Increasing reliance on commercial catch data instead of less biased sources over time; in '20/'21, ADFG may have overestimated weight averages by referring to obsolete commercial data]*

*Step 3. Apply fecundity relationship [Problem 3: from 2005] to determine how many herring of those proportions it would take to produce that many eggs.*

*Step 4. Voila! Biomass 2021.*

### **Long version:**

See the most recent [stock assessment](#) for full methodology.

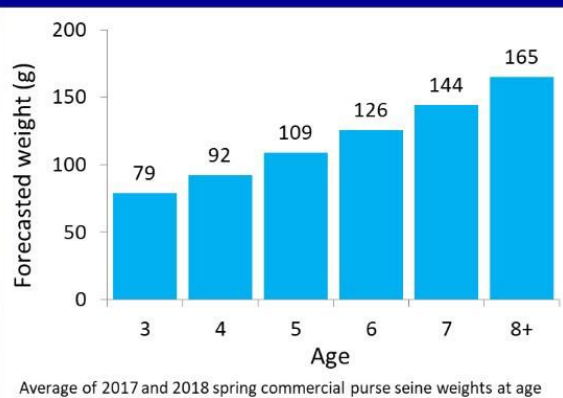
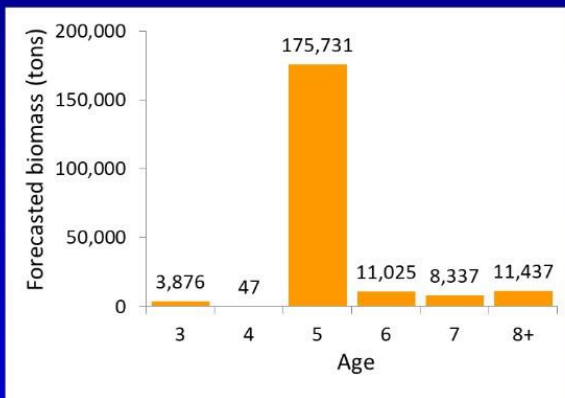
## **High GHL, High Risk:**

## 2021 forecast biomass and weight at age

2021 Forecast = 210,453 tons

GHL = 33,304 tons

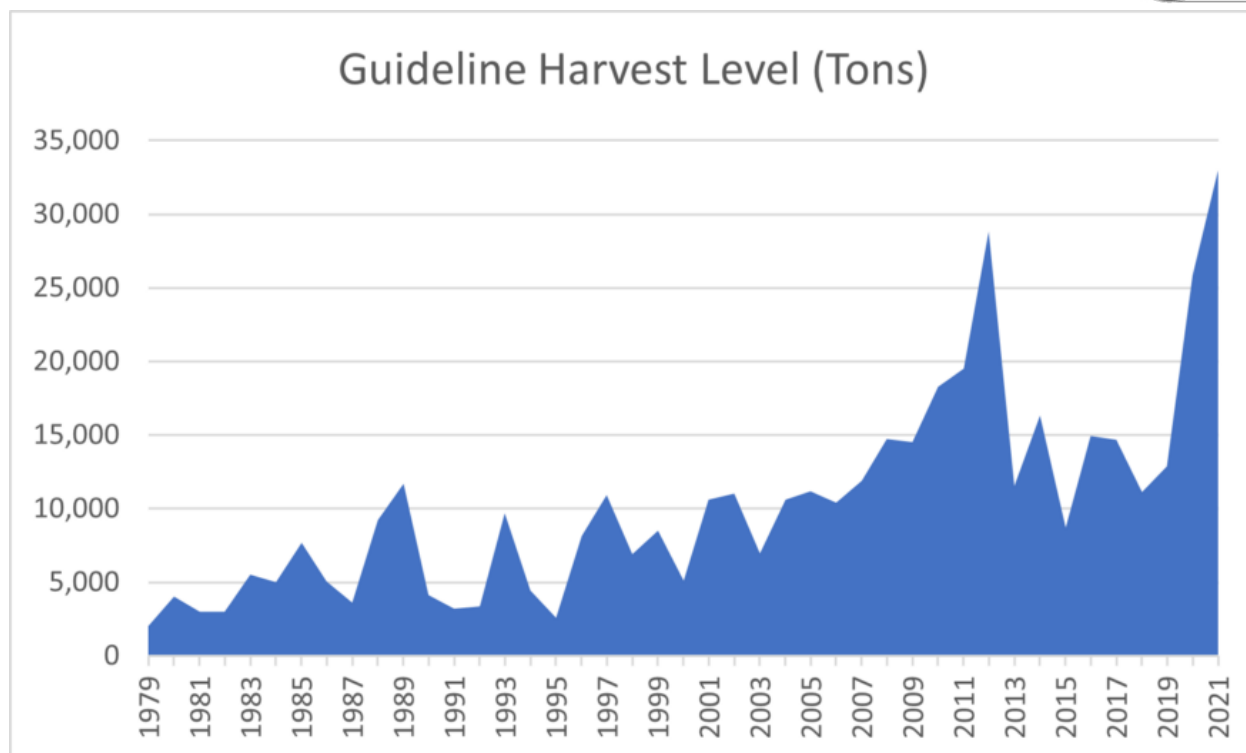
Forecast average weight = 112 grams



27

The upshot of all of this is that if the fishery successfully pulled in 16,000 tons of herring averaging 110-g, and if the cohort of age-5 herring were on average smaller than forecast (which appears highly possible from 2020 cast net surveys), then the relatively small populations of herring over age-6 were disproportionately slaughtered. Historically, it was not at all uncommon for herring in Southeast Alaska to live to 12–15 or older; this fishery systematically annihilates elder herring. It is a poor practice for ecosystem resilience and healthy maritime cultures.

That's bad for everybody.



The survey area, intensity, and efficiency have all increased over the years, leading to a higher “Guideline Harvest Level” as time has gone on. Given shifting methodology, the increasing GHL doesn’t mean that herring populations and herring population health have increased to scale with the GHL. Management must be very careful to avoid causing catastrophic harm with harvest levels set as high as they are today. Poor data was used heedlessly to guide 2020 and 2021 GHLS.

## Some questions:

1. What was the average weight from the 2021 Sitka Sound sac roe fishery, and what was the average weight from the 2021 active spawn cast net surveys?
2. What was the average weight of age-5 herring in the 2021 Sitka Sound sac roe fishery? In the 2021 active spawn cast net surveys?
3. What were the proportions-at-age in the active spawn cast net surveys, in particular of the pre-2016 brood years? How do those numbers compare to the commercial harvest numbers?
4. By what mechanism did Outer Kruzof become part of the Sitka Sound sac roe fishery, and thus, part of the egg deposition count from which the biomass of Sitka Sound herring is reached? It was not part of the fishery in 1996. What has changed and when, exactly, did that change occur? How does ADFG account for expanding study area when making biomass comparisons over time?
5. How does ADFG account for bias in sample types and why have commercial test sets have become a favored metric? How does ADFG account for changes in sample methodology over time?



6. What was the deepest that dive surveys for eggs went in 2021? In 2020? In 2008? In 1989? How does the department account for inflation in biomass numbers from counting more eggs, deeper, as time goes on?
7. Why does ADFG believe that the 2005 fecundity data is appropriate for application to the dominant 2016 age cohort of herring and the small-at-age herring currently in Sitka Sound? What are the implications if the real fecundity was substantially different in 2021 than in 2005?

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**RE: Second Request to Schedule Consideration of Proposal 282 Issue Outside of March 2022 Meetings**

On October 20, 2021 the Board accepted ACR 7 (now called Proposal 282) regarding changes to commercial fishing periods in the Shumagin Islands Section and Dolgoi Island Area for consideration at an upcoming Board meeting. On November 5, 2021, Area M Seiners Association submitted a letter to you requesting that ACR 7/Proposal 282 not be considered at the Board's March 11-18, 2022 meeting because the meeting dates conflict with the State-water Pacific cod fishery (5 AAC 28.081), in which a large proportion of Area M fishermen participate.

At the Board's December 6, 2021 meeting in Cordova, the Board considered Area M Seiners' request (PC014) and rejected it. In response to a request from the Chair, Executive Director Haight reported to the Board that CFEC records (RC122) show 21 permit holders hold both Area M *seine* permits and South Pen pot cod permits. The Board decided to not change the proposed schedule and Board Chair Carlson-Van Dort stated that there is plenty of opportunity for fishermen to express opinions and submit input.

The Board's decision was based on inaccurate information, which appears to have been solicited by the Chair in a deliberate attempt to misrepresent and downplay the scope of the scheduling conflict. The information was inaccurate in three respects.

First, as written, Proposal 282 requests restrictions on all gear types, not just seine gear. Thus, the scheduling conflict affects not just seine fishermen, but set and drift gill net fishermen as well. Based on CFEC data provided by ADF&G (attached), the number of Area M seiner, set net and drift gill net permit holders who also held cod permits was **79** in 2019, **57** in 2020 and **80** in 2021. By requesting and relying on data for seine permits only, the Chair substantially downplayed the extent of the conflict. (Notably, the CFEC data show that, even for seine permit holders the information presented to the Board was inaccurate; according to the CFEC, the number of Area M seine permit holders who also held cod permits was 28 in 2019, 27 in 2020 and 28 in 2021).

Second, by selecting 2020, the Chair downplayed the extent of the conflict. As the CFEC data show, the overlap in permit holders was significantly higher in 2019 and 2021. By selectively using data from 2020—the year in which the overlap was lowest in the last three years—the Chair presented biased data to the Board. This bias is compounded by the fact that the harvest limit for the cod fishery in 2022 is 24% greater than 2021, which will likely lead to greater participation by Area M salmon permit holders in the cod fishery.



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Third, the information solicited by the Chair and presented to the Board also downplayed the extent of the conflict because the conflict is not limited to fishermen who hold permits in the Area M salmon fishery and the cod fishery. For example, some holders of Area M set net permits, who will be directly impacted by Proposal 282, do not hold cod permits but still participate in the cod fishery, either as crew on cod boats for other permit holders or in processing plants, and thus will be prevented from attending the Board meeting.

The fundamental goal of Proposal 282 is to further restrict Area M salmon fisheries. If the changes to 5 AAC 09.365(d) proposed by Proposal 282 are adopted by the Board, open fishing periods in June in the Shumagin Islands and Dolgoi Island Area could be reduced 35% for set netters and 41% for seiners and gillnetters from the current regulations and the Post-June fishery could be reduced 41% from the current regulations for all gear types. It is crucial that Area M fishermen—not just seiners, but all fisherman who participate in the June and Post-June fisheries—participate in the Board process for consideration of Proposal 282. Due process requires that these fishermen be afforded the opportunity to attend the Board meeting in person to protect their rights and their livelihoods, and to provide the Board with data and perspectives that are sorely lacking from the consideration of the Chignik sockeye issue thus far.

It would be contrary to State law and policy to require Area M fisherman to forgo a commercial cod season just to participate in the Board process where the Area M salmon season is being considered. The due process clause of the Alaska Constitution provides: “No person shall be deprived of life, liberty, or property without due process of law.” Alaska Const. art. I, § 7. “This clause requires that adequate and fair procedures be employed when state action threatens protected life, liberty, or property interests” Doe v. Alaska Dep’t of Pub. Safety, 444 P.3d 116, 124 (Alaska 2019). “The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner.” Mathews v. Eldridge, 424 U.S. 319, 333 (1976). Due process requires that the Board ensure that Area M fisherman have the opportunity to be heard and to adequately represent their interests during the Board’s consideration of the Area M fisheries issues raised by Proposal 282. Thus, the Board should not schedule consideration of Area M issues at a time when Area M fishery participants will not be able to attend.

We respectfully request that you reconsider our request to re-schedule Proposal 282 for later in March or April to avoid the conflict presented by the current schedule, and that you do so on the basis of accurate and unbiased data. Thank you for your consideration.

Sincerely,



**Colby Boulton**

*Plant Manager*

*Peter Pan Seafood Co, LLC*

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December 22, 2021

Alaska Department of Fish and Game  
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Via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

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

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

Petersburg Vessel Owner's Association (PVOA) is composed of 85 members participating in a wide variety of species and gear type fisheries in state and federally managed waters and businesses supportive to the industry. PVOA members fish throughout Alaska from Southeast to the Bering Sea. Targeted species include salmon, herring, halibut, sablefish, crab, shrimp, sea cucumbers, and geoducks.

We appreciate the opportunity to provide these comments on the upcoming meeting. Due to the diversity of our membership, PVOA works hard to remain impartial on allocative proposals between commercial herring and salmon gear types. We do support the *Southeast Alaska Enhanced Salmon Allocation Management Plan* passed by the Board in 1994. You will find we took no position on salmon proposals that we felt would not help provide the fair and reasonable distribution of enhanced fish in the value allocations of (1) seine – 44 - 49 percent; (2) hand and power troll – 27 - 32 percent; (3) drift gillnet – 24 - 29 percent in accordance with the management plan. As you can see in Figure 92-1, the purse seine gear group is right in their range, drift gillnet is slightly above, and troll is below<sup>1</sup>.

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<sup>1</sup> 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.

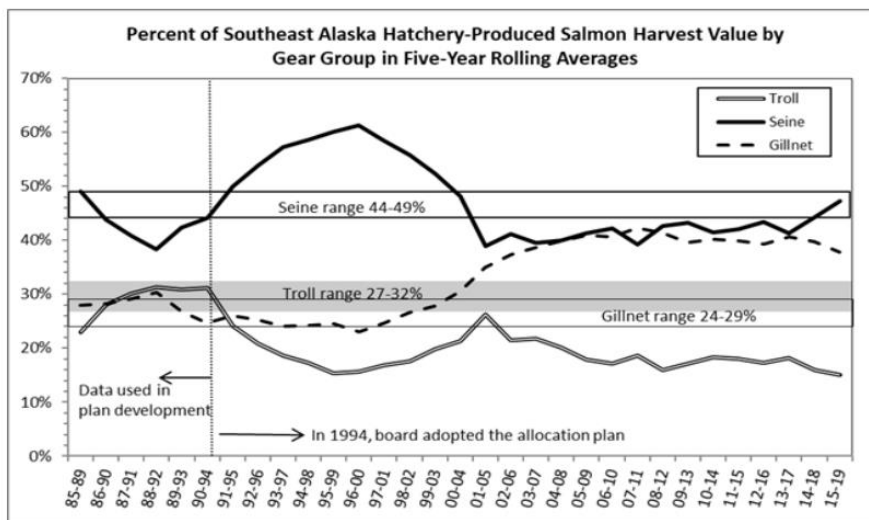


Figure 92-1.–Percent of Southeast Alaska hatchery-produced salmon harvest value by gear group in five-year rolling averages.

**Proposal 81 – support**

As the primary commercial harvesters of Chinook salmon, the troll fleet has seen severe reductions to their catch limits due to decreases in abundance. We support this proposal as a means to ensure Alaska has the opportunity to maximize the harvest of their allocation of Chinook salmon under the Pacific Salmon Treaty and aid a commercial gear group that has been struggling in recent years.

**Proposal 82 – support**

PVOA supports aligning the *Southeast Alaska King Salmon Management Plan* with provisions of the renegotiated Pacific Salmon Treaty for 2019–2028.

**Proposal 83 – oppose**

Managing the sport fishery on a rolling average may result in overages in their harvest allocation in years of low abundance and underages in years of high abundance. Many Chinook stocks throughout Southeast are in low abundance and we have three action plans for Chinook salmon ‘stocks of concern’ in front of the Board at this meeting. We don’t feel it’s an appropriate time to implement a harvest strategy that could lead to overages in a Chinook fishery.

**Proposal 97 – oppose**

Under the current THA management plans throughout Southeast Alaska, the three gear groups have been closer to their *Enhanced Salmon Allocations* ranges than in the previous decade. PVOA opposes any proposals we felt would offset this balance. Additionally, troll gear is not efficient enough to catch all the fish returning to the Anita Bay THA. We feel it is



essential gillnet and purse seine gear continue to be used to catch returning chum and chinook salmon in a timely manner while the fish are of the highest value.

### **Proposal 99 – support**

This matches the Southeast Cove THA management plan from the last four years. During these years the purse seine fleet was within their allocation established in the *Southeast Alaska Enhanced Salmon Allocation Management Plan*. Additionally, the troll fleet was closer to obtaining their allocation than in the past. Members believe continuing this gear rotation is important to help bring all three gear types into their range.

### **Proposal 100 – oppose**

Members do not support removing gillnet gear as an option to harvest in the Southeast Cove THA. Retaining gillnet as a legal gear type enables flexibility to adjust gear rotations between THA's in the future to manage for enhanced fish allocations in regulation.

### **Proposal 101 & 103 – oppose**

During the permitting process for hatcheries, ADF&G reviews the likelihood of enhanced fish straying into wild systems, and the ability for enhanced fish to be harvested without negatively impacting wild fish. They also strive for run timing differences between enhanced releases and any nearby wild stocks to ensure minimal interaction between enhanced and wild salmon. The Commissioner of ADF&G must sign off on all permitting and has the ability to deny any application if there are any biological concerns.

### **Proposal 102 – oppose**

Members believe a 1:2 drift gillnet to purse seine gear rotation in the Deep Inlet THA would drive the gear groups out of their range.

### **Proposal 104-109 – support**

We support this suite of proposals from SSRAA and ADF&G that would create management plans for THAs/SHAs in Burnette Inlet, Port Saint Nicholas, Carroll Inlet and Port Asumcion to allow common property openings and cost recovery harvest opportunities for these newly established enhanced fish release sites.

### **Proposal 111 – support**

PVOA supports this proposal to allow the gillnet fleet to fish a 6" net during times of restriction for minimum and maximum net size of 6". This would reduce the number of different sized nets a gillnet fishermen would need to buy and simplify regulations.

### **Proposal 112 – support**



The drift gillnet fleet has been unable to harvest their full allocation of coho under the Pacific Salmon Commission Treaty Annex for the Taku River year after year. Members believe the ability to use deeper nets could increase their harvest. This could be limited to Taku Inlet to reduce chances of interacting with other stocks.

### **Proposal 116 – oppose**

Members appreciate the intent of the proposal to reduce waste. However, an opportunity to sell and benefit from the bycatch of Chinook salmon does not incentivize avoidance practices and careful release of Chinook. This is a valuable species currently experiencing low returns in some areas of Southeast. Regulations need to reflect this and encourage avoidance of interactions in some districts.

### **Proposal 117 – support**

Members support this proposal as a means to increase harvest for the troll fleet and bring them closer to their allocation range under the *Southeast Alaska Enhanced Salmon Allocation Management Plan*.

### **Proposal 119-120 – oppose**

Our membership is supportive of the status quo for the net fisheries. These proposals would redefine and open new area to the gillnet fleet. Additionally, ADF&G uses CPUE data from the gillnet fishery to assess salmon abundance and manage openings. Dividing the area and increasing traditional fishing areas would make catch rates incomparable to past rates.

### **Proposal 121 – oppose**

Currently commercial fishermen in the area give sport fishermen a wide-berth and do not set their nets in favored sport fishing spots, staying clear of the Triplet Islands northeast of the mouth of Coffman Cove. Members do not believe there is a safety issue and are sure the commercial and sport fishermen in the area can work together to solve any conflict.

### **Proposal 122-124 Status Quo**

The *Northern Southeast Seine Salmon Management Plan* was developed and amended over several Board of Fisheries cycles to address concerns for incidental harvest of sockeye salmon in this mixed stock area during purse seine openings. A portion of sockeye stocks returning to Chilkoot Lake, Chilkat Lake, Taku River, and Port Snettisham pass this area. PVOA supports these past efforts and asks for no changes.

### **Proposal 128 – Oppose**



Prohibiting an anchor forces gear to be tended the entire time it is being fished. We believe this is the best practice to decrease the chances of predation and interception of unwanted species.

### **Proposal 143 – support**

Members support required inseason reporting of non-resident sport fish harvest to help aid ADF&G in catch accounting and management decisions. Currently the only reporting is the statewide mail survey on a voluntary basis.

### **Proposal 144 – support**

PVOA participates in the International Pacific Halibut Commission and North Pacific Fishery Management Council regulatory bodies and understands the current management difficulties from imperfect catch accounting of halibut. ADF&G's creel survey samples a limited portion of sport halibut fishermen and excludes remote locations. The creation of a logbook program for rental vessels would help with catch accounting and management of the halibut resource.

### **Proposal 145-148 – support**

PVOA members support the prioritization of resident fishermen.

### **Proposal 154 – oppose**

It would be too hard to determine a fish is legal before shooting with an arrow, which is a lethal gear type.

### **Proposal 156-158 – oppose**

There is no documented scientific need for conservation of the Sitka Sound herring stock at this time. The forecasted biomass has increased from 55,637 tons in 2018 to 64,343 tons in 2019 to 212,330 in 2020 and 210,453 in 2021.

The Sitka Sac Roe Herring management plan has several conservation measures built in and historical returns show there is no need to change harvest control rules. In order for the fishery to occur, there must be an available spawning biomass above a 25,000 ton threshold. This threshold has increased from 6,000 in 1977 to 7,500 in 1983, to 20,000 in 1997, and 25,000 in 2009 as the biomass has increased. There is also a sliding Harvest Rate corresponding to abundance<sup>2</sup>.

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<sup>2</sup> Dupuis A., D. Harris, B. Meredith, and P. Salomone. 2021. 2021 Southeast Alaska herring sac roe Fishery Management Plan. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report No. 1J21-04, Douglas.



### **Proposal 159-160 – support**

According to ADF&G comments in RC2, “the department would continue to distribute the commercial harvest by fishing time and area if the department determines that it is necessary to ensure that subsistence users have a reasonable opportunity to harvest herring spawn. Additionally, the department would continue to consider the quality and quantity of herring spawn on branches, kelp, and seaweed, and herring sac roe when making fishery management decisions for both the subsistence and commercial fisheries.”

As the needs of subsistence users would continue to be ADF&G’s first priority, members feel the sited regulations and closed area could be repealed without negatively impacting other users.

### **Proposal 161 – support**

This would match reporting requirements in other subsistence fisheries throughout the state. And it would likely result in more timely collection of basic harvest data according to ADF&G comments in RC2.

### **Proposal 164 – support**

PVOA members support this proposal as a means to change the pace of the sac roe fishery hoping markets and products could be better developed. However, members noted they don’t feel the fishery is dangerous or unable to be managed under the current regulations. ADF&G has successfully managed the fishery in the past under both competitive and industry devised shared quota fisheries.

### **Proposal 166 – oppose**

This issue was considered by the board during the 2015 Southeast and Yakutat Finfish meeting. It was determined that the CFEC administrative area for the Northern Southeast SOK herring fishery includes Sitka Sound. Therefore, this action could only be undertaken by CFEC and not the Board. The Board then tabled the proposal until the Statewide Finfish and Supplemental Issues meeting in 2016 and in conjunction with the Department of Law, asked CFEC to consider changing the administrative area for the Northern Southeast SOK herring fishery to exclude Sitka Sound.

CFEC held a hearing on November 6, 2015 to consider the proposed regulation change. Of the 61 comments received in writing, telephonically, or in person only the author of the original proposal was in favor. Based on the comments received, CFEC took no action<sup>3</sup>.

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<sup>3</sup> Twomley, B., 2016. *Board of Fisheries Action on Southeast and Yakutat Finfish Meeting Proposal 126*. [online] Available at: <[https://www.fishgame.state.ak.us/static/regulations/regprocess/fisheriesboard/pdfs/2017-2018/state/misc/kapp/twomley\\_20160108.pdf](https://www.fishgame.state.ak.us/static/regulations/regprocess/fisheriesboard/pdfs/2017-2018/state/misc/kapp/twomley_20160108.pdf)>.



Later the Board ultimately took no action on this proposal at the 2016 meeting based on a lack of regulatory authority to allow new entrants into a fishery or to determine who might enter a limited entry fishery.

### **Proposal 167 – oppose**

As previously stated, PVOA strives to remain impartial on proposals that are allocative between our various gear groups in the herring fisheries and supports the status quo.

### **Proposal 168 – oppose**

In the last two years, the Southeast Alaska Herring Summaries have noted significant spawn in Revilla Channel. And ADF&G took the time to sample herring and survey spawn deposition in the area both years.

In 2020, “A total of 11.2 nautical miles (nmi) of herring spawn was observed in State waters, above the 2010-2019 average of 4.2 nmi. Herring samples were obtained for age, weight, and length (AWL) analysis and a spawn deposition survey was completed.”<sup>4</sup>

In 2021, “Aerial surveys were conducted from March 18 through April 7, with herring spawn first observed March 26 on Double Island. Spawning continued in Revilla Channel through March 30, with additional spawn events observed on April 5 and April 6. Spawn was observed on Double, Cat, Dog, Village, and Mary islands with the most intense spawn occurring on the western shore of Cat Island. The total cumulative spawn mileage of 7.9 nautical miles (nmi) in State waters was above the recent 10-year (2011–2019) average of 5.3 nmi. Herring samples were obtained for age, weight, and length (AWL) analysis and a spawn deposition survey was completed.”<sup>5</sup>

This area has not been commercially fished since 1998, but recent years show there may be potential for a fishery in the future.

### **Proposal 169 – oppose**

Many herring stocks throughout Southeast are experiencing an upward trend. From the 2021 Southeast Alaska Herring Summary previously cited, in West Behm Cannal “the total cumulative spawn mileage of 8.2 nmi was above the recent 10-year average of 5.3 nmi.”

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<sup>4</sup> Alaska Department of Fish and Game, 2020. *2020 SOUTHEAST ALASKA HERRING SUMMARY*. Juneau, AK 99811-5526. [online] Available at: <<http://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1155591159.pdf>>.

<sup>5</sup> Alaska Department of Fish and Game, 2021. *2021 SOUTHEAST ALASKA HERRING SUMMARY*. Juneau, AK 99811-5526. [online] Available at: <<http://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1265317815.pdf>>.





This area has not been commercially fished since 2011, however, PVOA members are opposed to permanently closing herring fisheries. These areas have been closed during low abundance and ADF&G comments note they wouldn't be reopened unless the stocks meet threshold for several years and extensive aerial and sonar surveys were conducted to ensure an adequate biomass.

### **Proposal 172 – support**

PVOA members support changing the shrimp pot season to May 15 through July 31 to avoid harvesting shrimp during egg hatching. However, members have concern over how this would be implemented. Would there be a Fall 2022 fishery followed by a Spring 2023 fishery as we transition to new season dates? Or would the fishery be closed the entire year in 2022 and not open until the Spring of 2023?

### **Proposal 175 – oppose**

The shrimp pot fishery has faced more changes in gear regulations in the past several decades than most fisheries in Southeast, increasing the costs of participation. PVOA prioritizes flexibility in gear regulations to allow for innovation. Not adoption of regulations that force the whole fleet to fish the way one participant prefers.

### **Proposal 176 – oppose**

ADF&G has been able to effectively manage the fishery under the current pot limits. There are several proposals that would change the shrimp fishery drastically, such as changes to the season dates. Members ask the Board consider the cumulative impacts of adopting several changes to the fishery in one cycle.

### **Proposal 177-179, 200-201, 204-208, 210 – oppose**

PVOA opposes the various proposals seeking to close waters. These proposals lack sufficient explanation of a biological concern and without a documented scientific need for conservation, we do not support limiting access to fisheries through area closures. PVOA has confidence in the Emergency Order authority given to the department to open and close fisheries in response to changes in abundance.

Commercial fisheries are open for a limited number of days a year while subsistence and personal use is open all year for Dungeness crab and shrimp.

The Dungeness crab fishery has 17 area closures around communities. ADF&G staff comments state “closing additional areas to commercial fishing for Dungeness crab will result in increased density of gear in the areas that remain open, potentially increased gear loss, and increased potential for localized depletion.”

### **Proposal 182 – support**



Splitting the District 15 GHR for shrimp into District 15 East and District 15 Remainder would match management practices since 2009 that have been effective.

### **Proposal 184 – support**

PVOA supports clarifying regulations plainly to state that longlining shrimp pots is legal in the sport fishery.

### **Proposal 190 – support**

The 200,000 pound legal male biomass threshold in regulation to trigger a commercial fishery is an economic threshold chosen by the industry in 2002. Since then, prices for king crab have increased and fewer fisheries have been conducted.

PVOA submitted this proposal as a way to create a slow, manageable fishery to allow the harvest of red king crab at a biological threshold lower than the economic threshold of 200,000 pounds of legal male crab. We used 88,500 pounds as a placeholder to be substituted. After the 2018 Southeast and Yakutat meeting when we submitted a similar proposal, ADF&G agreed to work on determining a biological threshold they felt comfortable harvesting at.

In writing this proposal it was important to permit holders to maintain the competitive fishery when abundance returns to a level above 200,000 pounds of legal male crab.

In the last 18 years, the commercial fishery has been prosecuted three times. Red king crab mature at 6 years and do not reach legal size until 8 years. The last fishery occurred five years ago in 2017. Members are looking for a way to harvest some of these older crab that would otherwise die of old age resulting in missed economic opportunity.

### **Proposal 191 – support**

In January of 2020, the Alaska Legislature debated cutting funding for the Southeast Alaska red king crab assessment from the Commercial Fisheries Division of the ADF&G budget. In testimony to the House Finance Subcommittee on the ADF&G Budget on January 28<sup>th</sup>, ADF&G noted they would be forced to close the personal use and commercial red king crab fishery without the survey.

PVOA submitted this proposal as a way to prosecute a conservative 3-7 day fishery, outside of 11-A, biennially based on a comparison of historical fishery CPUE. Members felt this would be the best way to determine stock status without a survey. Members also didn't want to disrupt the Section 11-A personal use fishery and hoped that fishery could continue to be conducted in a similar manner.

### **Proposal 192 – support**



On January 16<sup>th</sup>, 2020 15 permit holders, petitioned ADF&G Commissioner Vincent-Lang asking he review under 5AAC 34.035 the decision to close the Northern Area, East Central, Mid-Chatham, and Lower Chatham for the 2020 season. Two industry associations, and three processors sent a similar letter asking for more transparency in management decisions for golden king crab.

This is a fishery dependent on commercial logbooks, daily call-ins to managers, port sampling, and personal use harvest reports as the only available data for determining the status of the stocks. PVOA has continually asked all areas open at least briefly in a season, reasoning this provides ADF&G with a free survey and prevents gaps in the data used for management.

PVOA submitted this proposal as a placeholder, hoping to work with ADF&G to write a new management plan for golden king crab to be substituted for this language. This proposal was our first attempt and at subsequent ADF&G King and Tanner Task Force meetings, staff could not provide feedback on it until the December 3, 2021 meeting. In the meantime, they did present industry with a new harvest strategy for golden king crab that uses a comparison of recent and historical CPUE from 2000-2017.

ADF&G's draft harvest strategy has clear decision rules to predict how a GHL will increase/decrease, when an area will be closed, and when it will reopen. Industry appreciates the transparency of this draft harvest strategy, but **PVOA does not recommend substituting ADF&G's draft golden king crab harvest strategy for this language to make it regulation.** We feel it needs more time to be adjusted through the King and Tanner Task Force process.

### **Proposal 193 – support**

This area was open to commercial harvest of golden king crab prior to the 2005 Southeast and Yakutat Shellfish meeting when areas were re-drafted and re-named. PVOA is not asking to increase the GHR for the area, just to increase the size of the area the GHR can be harvested from. ADF&G comments note this area contains substrate and depths where golden king crab reside.

### **Proposal 195 & 197– support**

These proposals have the ability to extend the time some areas are open for the harvest of Tanner crab. PVOA supports redefining areas without participation as 'exploratory' and extending time allowed to fish in 'exploratory' areas to provide opportunity for anyone willing to try fishing off the beaten path in these non-traditional areas.

During the December 3, 2021 ADF&G King and Tanner Task Force meeting it was agreed that the language 28 days or April 1 would be more appropriate language for Proposal 195. This would prevent the Tanner season from extending into April when they molt and mate.

### **Proposal 196 – oppose**



PVOA members oppose the reduction of pots in the golden king crab fishery from 100 to 80. As mentioned in Proposal 190, ADF&G has used a harvest strategy for the last two seasons that compares CPUE data to historical CPUE from 2000-2017. Reducing the pot limit at this point would degrade the data and make it less comparable.

We understand ADF&G's concern for 100 pots and the amount of time they need to advise fishermen of a closure. Fishermen don't have to get all their gear out of the water by the closure, just into a non-fishing configuration. Meaning no bait and the doors tied open.

Fishermen can currently haul 100 pots in a day. A reduction would lead to double hauling some gear in a day giving less time for small crab to filter out on the bottom and increasing handling.

### **Proposal 198 - oppose**

Currently the golden king crab and Tanner crab fishery opening dates are tied together. Changing the Tanner fishery start date would complicate the fair start between Tanner and golden king crab fishermen, especially in the case of fishermen who hold both permits.

The current regulations support season openings during the most favorable tides, PVOA does not support a fixed date to prevent gear loss during large tides.

### **Proposal 202-203 - support**

PVOA supports reopening a portion of the closed area around Tenakee and the closed area near Elfin Cove.

Aside from Kasaan, the closure in Tenakee Inlet is one of the largest closures around a community. As the proposer noted, there are only 150 residents in Tenakee, all able to subsistence fish in the entire inlet 365 days a year. Members support retaining the closure around the town and opening the Kadasham flats for commercial harvest.

ADF&G staff comments in RC2 note Elfin Cove has about 60 residents that harvest an average of 4.99 pounds of crab per capita. There is no need for an area closure to ensure they are able to maintain harvest at these levels.

RC2 also notes there are no conservation concerns for either area.

### **Proposal 211 - support**

PVOA support opening the Sitka Sound Special Use Area to commercial Dungeness fishing for the entire fall season from October 1-February 28. The last three months of the Fall season during which the Special Use Area is currently closed is in the winter. We predicted participation would be low due to winter weather, the area being open to the ocean, and the tendency for processors to close before December. Crab also fish slower when the



water is colder. However, this could be an opportunity for a small boat to haul gear occasionally when the weather allows and direct market them from the dock.

### **Proposal 214 – oppose**

In the last three years there has been an increased amount of fishermen buying square shaped Dungeness pots under the 50” diameter and 18” height requirement from places such as Custom Crab Pots<sup>6</sup>. Some fishermen have reported they stack better and are safer on deck. PVOA believes fishermen need the ability to adapt in fisheries and are opposed to regulations we feel stifle innovation. The fishery has been well managed for decades under the current size and pot limits.

### **Proposal 216 – support**

In 2021, the International Pacific Halibut Commission chose longer fishing dates than in the past with a start date of March 6<sup>th</sup> and end date of December 7<sup>th</sup>. The Federal sablefish Individual Fishing Quota (IFQ) fishery matches the IPHC dates each year. Members support this proposal that would extend season dates in the Southern Southeast Inside sablefish fishery into December, creating a closer match to other longline fisheries and providing more time to harvest.

### **Proposal 220 – support**

Since 2017, many PVOA members have switched to fishing longline pots or a combination of hooks and longline pots for sablefish in both the Federal sablefish IFQ fishery and Southern Southeast Inside sablefish fishery. For members that prefer to fish with pots and participate in multiple sablefish fisheries, it would be convenient to not have to switch gear.

### **Proposal 225 – oppose**

During the 2018 Southeast and Yakutat Board of Fisheries meeting, the Board established a nonresident annual limit of eight sablefish throughout SEAK. PVOA is supportive of the effort that went into this allocative decision and supports the status quo.

### **Proposal 229 – oppose**

ADF&G comments note that under this proposal, the sport fishery allocation in Central Southeast Outside (CSEO) would likely be exceeded. This would also complicate regulations by having a separate limit in CSEO from the remainder for NSEO.

Thank you for your time and dedication in considering public comments. PVOA will have representatives present throughout the January meeting. We are happy to answer any question in person, or by email at: [pvoa@gci.net](mailto:pvoa@gci.net).

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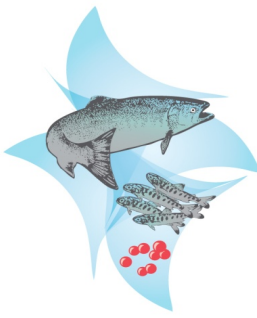
<sup>6</sup> <https://customcrabpots.com>



Respectfully,

*Megan O'Neil*

Megan O'Neil  
Executive Director



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

December 21, 2021

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

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

**RE: PWSAC Opposes Proposals 101 and 103**

Dear Alaska Board of Fisheries Members:

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC is Alaska's largest hatchery organization, employing 53 full-time staff members and 75 seasonal workers and operating an annual budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. PWSAC is governed by a diverse board of 45 members who represent over 750 commercial salmon fishing permit holders and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors.

Proposals 101 and 103 are nearly identical in scope and intent as proposals 49-53 submitted at the PWS/Upper Copper and Upper Susitna Rivers Finfish and Shellfish meeting November 30<sup>th</sup> – December 6<sup>th</sup>. PWSAC submitted detailed, written comments (PC186) and provided oral public testimony in opposition to proposals 49-53. An overwhelming number of Alaskans made their voices heard in opposition to the proposals while the proposer provided no public written or oral comment. The Board of Fisheries rejected and took no action on proposals 49-53.

PWSAC supports comments from Southeast Alaska Hatchery Operators regarding proposals 101 and 103 at the Southeast and Yakutat Finfish and Shellfish Alaska Board of Fisheries meeting. PWSAC opposes proposals 101 and 103 and respectfully requests **that the board reject proposals 101 and 103.**

Sincerely,

Geoff Clark  
General Manager/CEO

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

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

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



PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

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



PC293  
1 of 3

December 21, 2021

**VIA E-MAIL**

Marit Carlson-Van-Dort, Chair  
Alaska Board of Fisheries  
P.O. Box 115826  
Juneau, AK 99811

**Re: Support Proposals: 98, 99, 100, 102, 122, and 123**  
**Oppose Proposals: 101, 103, 124, 156, 157, and 158**

Dear Madam Chair Carlson–Van Dort and Board of Fisheries Members:

The Purse Seine Vessel Owners Association (“PSVOA”) respectfully submits the following comments in connection with the above-referenced proposals before the Board at the upcoming Southeast Alaska and Yakutat finfish and shellfish meeting in Ketchikan. PSVOA is a commercial fishing organization having members that participate in the salmon purse seine and other commercial fisheries in Southeast Alaska.

**Support Proposal 98**

PSVOA supports this proposal which would change the ratio of gillnet to purse seine openings in the Anita Bay THA from 2:1 to 1:2. 5 AAC 33.383 (d)(3) states the ratio of gillnet to purse seine openings for the 2018-2020 fishing seasons shall be 1:1. Rather than revert to the gillnet to purse seine opening ratio of 2:1 as stated in (d)(4), a gillnet to purse seine opening ratio of 1:2 is necessary to achieve the purse seine allocation of enhanced salmon as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.

**Support Proposal 99**

PSVOA supports this proposal which would establish a fixed fishing schedule in the Southeast Cove THA for purse seines and trollers whereby the seine fleet would fish on Sunday and Thursday and the troll fleet would fish the remaining days of the week. Gear group openings are currently determined by the department. This proposed fixed schedule is necessary to achieve the purse seine allocation of enhanced salmon as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.





### **Support Proposal 100**

PSVOA supports this proposal which would exclude gillnets from fishing the Southeast Cove THA. This proposal is necessary to achieve the allocation of enhanced salmon among gear groups as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.

### **Support Proposal 102**

PSVOA supports this proposal which would change the ratio of gillnet to purse seine openings in the Deep Inlet THA from 2:1 to 1:2. 5 AAC 33.376 (b)(1)(D) states the ratio of gillnet to purse seine openings for the 2019-2021 fishing seasons shall be 1:1. Rather than revert to the gillnet to purse seine opening ratio of 2:1 as stated in (b)(1)(B), a gillnet to purse seine opening ratio of 1:2 is necessary to achieve the purse seine allocation of enhanced salmon as set forth in the Enhanced Salmon Allocation Management Plan. 5 AAC 33.364.

### **Support Proposals 122 and 123**

PSVOA supports Proposal 122 which would remove the sunset clause regarding the 15,000 sockeye salmon harvest limit for purse seines in District 12 north of Port Mardsen during July. PSVOA also supports Proposal 123 which would reduce the time the sockeye salmon harvest is subject to the 15,000 harvest limit from July 22 to July 15. The Northern Southeast seine salmon fishery management plans are set forth in 5 AAC 33.366. The 15,000 sockeye harvest limit in section (a)(2) is limited to 2021. PSVOA supports the idea of making the 15,000 sockeye harvest limit permanent. Shortening the time period the sockeye harvest limit is in place from July 22 to July 15 would provide the purse seine fleet the ability to access northern migrating pink salmon in years where the pink abundance is sufficient to provide harvest opportunity.

### **Oppose Proposals 103 and 105**

PSVOA strongly opposes these anti-hatchery proposals. Both proposals are nearly identical to Proposals 49 – 53, which were recently rejected by the Board at the recent Prince William Sound finfish meeting in November. In permitting hatchery operations, the Alaska Department of Fish and Game (ADF&G) already considers many of the concerns raised in these proposals, including the need to minimize interactions between hatchery origin and wild salmon and the need to ensure harvest practices targeting hatchery produced chum salmon do not negatively impact wild fish.

The Alaska Hatchery Research Project is an ongoing research project designed to investigate the question of whether straying of hatchery origin salmon adversely impacts wild salmon stocks, and to what degree. At the conclusion of the study, the results will be published and peer reviewed. The results and conclusions derived from the study will provide ADF&G with an objective assessment of wild/hatchery salmon interactions. Any action taken by the Board to require reductions in hatchery production at the present time would be premature and not based on best available science. In sum, PSVOA respectfully requests the Board **reject** Proposals 103 and 105.

### **Oppose Proposal 124**

This proposal is related to Proposals 122 and 123 discussed above. However, this proposal would extend the wild sockeye harvest limit date from the current date of July 22 to July 31.



Extending the harvest limit date through the end of July is not needed for sockeye conservation and unnecessarily restricts the seine fleet's ability to access northern migrating pink salmon in years where the pink abundance is sufficient to provide harvest opportunity.

### **Oppose Proposals 156 -158**

All of these proposals seek to reduce the commercial harvest opportunity for the Sitka Sound commercial sac roe herring fishery. The Sitka Sound herring stock has been the largest and most stable stock in Southeast Alaska for decades. Proposal 156 changes the current Sitka Sound herring harvest rate strategy, which has been in place since 1983 and revised in 1998. In its comments, ADF&G correctly points out that this is an allocative proposal rather than a proposal based on the need for additional conservation measures. Moreover, the current harvest strategy in place since 1998 is based on the best scientific information available for Sitka Sound and contains conservation provisions that are beneficial to herring populations and the ecosystem.

Proposal 157 contains a complicated method of calculating the guideline harvest level (GHL) for the Sitka Sound commercial sac roe fishery, which would directly reduce commercial harvest opportunity in the fishery. The purported purpose of the proposal is to reduce the risk of overharvesting the older 5+ age class. However, as noted by ADF&G in its comments, calculating the GHL as proposed would only reduce the overall harvest rate, but it would not necessarily change the age composition of the harvest in the fishery. Moreover, the current harvest strategy already accounts for varying exploitation rates between different age classes.

Proposal 158 seeks to close the Sitka Sound commercial sac roe fishery if the proportion of herring age 5 and above is less than 20% of the total herring spawning biomass. As mentioned by ADF&G in its comments, applying this criterion from 1980 – 2020, the fishery would have been closed in 6 of these years, with an average annual ex-vessel value loss of \$1.9 million. According to ADF&G, it does not have the resources to conduct the large scale sampling program that would be required to determine age composition. As mentioned above, the current harvest strategy already takes into account varying exploitation rates between different age classes.

Thank you for your consideration of PSVOA's comments regarding these proposals.

Very truly yours,

*/s/ Robert Kehoe*

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



Submitted By  
RANDY KEAVENY  
Submitted On  
5/26/2021 8:33:11 AM  
Affiliation  
  
Phone  
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113 DARRIN DRIVE  
Sitka, Alaska 99835

I sent this message out a few weeks back and got nothing back....

I write you AGAIN....concerning the ever growing charter fleet in Sitka....what last years turmoil has shown us is that when the charter fleet is not present in the Sitka area the fishing is back to its 1990s stock....this year...already....total opposite and we just started....

Why...if you do not live in Alaska can these charter companies come up here....bring in thousands of people.....and then leave with there money and crews and profits and fish....etc etc etc.....

Last year was the first year in many that we were catching fish in places we haven't since the 90s...the reason...no pressure from the 50+ charter boats....this is PURE GREED!!!! Nothing else....they are never boarded like the residents are....they do not follow the rules and regs on the water....there crews are 20 yr old kids BARELY trained to handle an emergency situation....

With covid being such a big thing now a days....why are the crew members of these lodges allowed to fish all day with clients who may or may not have been tested/vaccinated...get back in to the docks....then allowed to go out bar hopping or to restaurants in town....possibly passing covid onto the local customers....the serving staff....who in turn bring it home to there families

If you are a board that cares about the communities of SE Alaska....or Alaska as a whole....this should be looked into....

I plan on passing this onto all the local newspapers that will take and print it.....

I am just saying what everyone else in the town is thinking...but afraid to put pen to paper...

The fact that they come into our communities for 90 days.....if that....then leave without contributing to our towns infrastructure is a slap in the face to all of us



Submitted By  
Randy  
Submitted On  
6/1/2021 9:43:41 AM  
Affiliation

Phone  
9077387371

Email  
[sundari@acsalaska.net](mailto:sundari@acsalaska.net)

Address  
113 Darrin Drive  
Sitka, Alaska 99835

i write you AGAIN....while i know that wild stock runs of salmon are not accurately forecast especially by the state....this time last year...fishing in Sitka was back to its 90's level...this year...TERRIBLE....unless you are one of the 100+ charter boats fishing out at the cape where they are stopping the fish from coming in....you might as well allow gill nets or seiners to fish out there...its that bad...during the covid outbreak last year..no or very few charter boats fishing here...this year...back at it full force...and us the RESIDENTS...the ones you are supposedly looking out for...are struggling to find 1 or 2 fish...im not a great fishermen but i can fill my freezer for my family when i need to....but with the price of fuel rising...it is becoming very expensive...

you guys are suppose to regulate this...but it has gotten out of control...6 lines per boat X 30 boats...and thats an underestimate... 180 lines in the water....every day...killing numerous fish...

enforcement...thats a laugh....there is no one out there regulating any of these charter boats...

its time you take a closer look at these charter lodges.....before all OUR resources are gone....

Submitted By  
Raymond Douville  
Submitted On  
12/13/2021 4:05:29 PM  
Affiliation



PC295  
1 of 4

I oppose proposal 83.

Each user group was allocated a certain amount of king salmon during the last treaty negotiation and each user group should be held responsible to stay within their allocation.

On years of low abundance, the troll fleet cannot afford to give up any of their king salmon allocation. The troll fleet already deals with very short openings and limited opportunity for king salmon. Proposal 83 would only further harm the troll fleets' ability to sustain its needs.

The charter/sport fleet continues to grow and have longer seasons. The king salmon abundance has been on the lower end in recent years.

It is very likely that proposal 83 will allow the charter/sport fleet to exceed their 20% allocation on most years and leave the troll fleet coming up short on their share.

The charter/sport fleet thinks this proposal is fair, but only because they stand to gain fishing opportunity on most years. This proposal would be unfair to the troll fleet.

Submitted By  
Raymond Douville  
Submitted On  
12/13/2021 4:58:12 PM  
Affiliation



PC295  
2 of 4

I support Proposal 217

Proposal 217 would give the commercial salmon troll fleet a fair bycatch allocation in the Southern Southeast Outer Coast (SSEOC) area.

When comparing the bycatch allocation in SSEOC to other outside water areas, SSEOC is far lower by percentage.

Retention of lingcod for the commercial salmon troll fishery in the Southern Southeast Outer Coast (SSEOC) area has closed before the end of the Summer troll season in 7 of the last 10 years. The data shows that the commercial salmon troll fishery is using their lingcod allocation and that they are under allocated on lingcod.

This is a proposal in which no one will lose any opportunity to harvest lingcod. Proposal 217 would allow the troll fleet a little more opportunity to retain lingcod during the summer salmon troll fishery

and

still leave plenty of opportunity for lingcod bycatch in the commercial groundfish jig fishery based on its harvest history over the last 15-20 years. As stated in the proposal:

“From 2003 through 2019, a total of only 79 lbs. of lingcod has been landed in the commercial groundfish jig fishery in the SSEOC area.”

The facts are clear in showing this is a fair proposal that would be harmless to any other gear group. Additionally, it would positively impact a commercial salmon troll fleet that has lost opportunities elsewhere.

Submitted By  
Raymond Douville  
Submitted On  
12/18/2021 7:17:55 PM  
Affiliation  
Commercial fisherman



PC295  
3 of 4

**I do not support proposal 177.**

Proposal 177 is poorly written and difficult to understand what and how much area would be closed to commercial fishing for shrimp if this proposal were to pass. From what little information I can gather by reading the proposal, it seems that this proposal may be asking to close an area that has historically been a commercial fishing area.

For those reasons, I do not support proposal 177.

Submitted By  
Raymond Douville  
Submitted On  
12/19/2021 3:15:51 PM  
Affiliation  
Commercial Fisherman



PC295  
4 of 4

**I support proposal 144**

The unguided non-resident sport fishing effort and harvest is putting increased pressure on our salmon and halibut resources. Bare boat charter/rentals are becoming a more popular way for non-residents to harvest more fish. Much of the fishing that takes place this way is unmonitored and unaccounted for. There needs to be a catch-reporting requirement for these types of operations for both salmon and halibut so the harvest can be accounted for and limited.

This an issue where local subsistence, charter and commercial fishermen all agree that accountability and lower bag limits for these operations is a must.

Currently there is no limit on the number of unguided non-resident charter/rental boats that are allowed. With a growing sport fish harvest of both salmon and halibut, due to these types of operations, it also has the potential to interfere with resource allocation between gear groups.

**For these reasons, I support proposal 144.**





Submitted By  
Raymond Merryman  
Submitted On  
12/18/2021 2:36:33 PM  
Affiliation

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4843786363

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[ramerryman@comcast.net](mailto:ramerryman@comcast.net)

Address  
1302 Sawmill Creek Rd  
Spc 39  
Sitka, Alaska 99835

To State Board of Fish & Game

My name is Raymond Merryman. I live in Sitka and have commercially Dungeness crabbed out of Sitka for the past 4 years.

I strongly oppose Proposal 201. If this proposal was approved it would take away very valuable crabbing grounds that myself and local crabbers utilize. Pushing our crabbing grounds farther away from Sitka is not in the best interest of anyone. Having the area closed for commercial operations but still open for recreational use does not make sense as the recreational crabbers already have a lot of grounds close to Sitka that are restricted for their use only. Expanding that restricted area comes at the detriment to commercial fishermen and crews that live and are a large part of Sitka's economy. The area should remain open to all that want to participate.

Sincerely,

Ray Merryman



Submitted By  
Ric Berkholtz  
Submitted On  
11/16/2021 8:55:39 PM  
Affiliation

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6128340207

Email  
[ricberk7@gmail.com](mailto:ricberk7@gmail.com)

Address  
3927 Adams Lane NE  
Seattle, Washington 98105

I am an environmentally conscious individual and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across Southeast Alaska. I support proposals 156, 157, and 158. We need to protect the herring to ensure the survival of Washington state's critically endangered Southern Resident Orcas. Our orcas depend on Columbia River Chinook salmon which rear in Southeast Alaska where their main food source is SE herring. Please prioritize protecting the herring for future generations!

Thank you



Submitted By  
Richard Curran  
Submitted On  
12/17/2021 8:31:28 AM  
Affiliation  
self

Oppose Proposal 225

Dear Chairman and Board Members:

I am a longtime resident of Southeast Alaska. I own and operate a longline vessel out of Sitka and own a NSEI Sablefish Permit and SE Sablefish IFQ. I have been fishing sablefish on Chatham since 1982. I have invested heavily in these resources and as a year-round resident of Sitka I invest heavily in our local economy. I have served on the Sitka Fish and Game Advisory Committee for over 10 years and am well aware of the various sides of these issues.

I oppose proposal 225 because it greatly increases the nonresident bag and annual limit of sablefish based on commercial ABC increases but does not reduce these limits when biomass falls so it is not abundance based management as suggested by the proposer. Also the proposer suggests a lower starting level of commercial GHL than was used in when bag limits were first established and would jump the bag limit up with small increases in GHL. The current GHL for Chatham strait is only 24% of what it was when the equal quota share system was imposed for conservation in 1998 and the commercial GHL has been below 1.1 million pounds between 2009 until 2020. As detailed by ADFG in their 2021 NSEI sablefish annual harvest objective news release NSEI sablefish spawning stock biomass remains at suppressed levels compared to the 1980s and 1990s and the recent recruitment events are fish that are not fully mature. In 2021, the Department imposed additional conservatism to management of the commercial fishery by imposing a 15% limit on any annual increases in commercial GHL. The non-resident sport fishery should be managed as conservatively. Staff comments indicate that a 6 fish bag limit would have increased the nonresident catch by as much as 36% each year with no accounting for future growth in angler numbers. The sport catch is taken off the top along with estimated bycatch and release mortality in the commercial fisheries before the annual GHL is set, in effect giving sportfish an unintended priority over the commercial fishery already. Since bag limits were implemented in 2009 the nonresident catch increased 481% by 2018 and accounted for 96% of the total recreational catch. During this same time period the commercial NSEI GHL declined below 2009 levels, hitting a 39% reduction in 2016. In 2021 we are finally back to the 2009 level of 1.1 million GHL but well below historic catch levels.

Annual limits for non-residents are a routine management tool to provide opportunity while still placing value on a resource. In 2018 96% of the sport sablefish catch was taken by non-residents. I continue to believe that an 8 fish annual limit is generous and provides reasonable opportunity for nonresident anglers to enjoy sablefish. There is no limit on charter vessels fishing for sablefish and there is an increasing unguided nonresident harvest as well. If you do decide to make bag and annual limits tied to abundance they should go down when the GHL is reduced as well. Further, any increase in bag or annual limits should be based on a larger increase in GHL than proposed—500,000 lb change for a 1 fish annual limit change up or down. I oppose proposal 225 and support status quo for this regulation.

Because of Covid I am unable to attend the meeting and serve on the Groundfish Committee but would like these comments considered in the discussion at that time.

Thank you,

Richard Curran

Submitted By  
Richard Curran  
Submitted On  
12/20/2021 7:43:20 AM  
Affiliation  
self



PC298  
2 of 3

Groundfish: Oppose 215 and 216

Dear Chairman and Board,

I am a NSEI permit holder having fished in Chatham for sablefish since 1985. I oppose these two proposals that lengthen the NSEI sablefish season. Extending the season to the IFQ opening would greatly compromise the ADFG assessment surveys and is likely to bring sperm whales into Chatham. The Department manages the commercial fishery very conservatively and the EQS for this fishery can easily be harvested in a day or two of fishing. We haven't spent more than 2 days fishing our quota in decades and it takes very little gear to catch an EQS. The quotas are still at low levels and the Department has a policy to limit annual increases in GHl to no more than 15% so they will stay low. There is no reason to have a more extended season than the current season – there is plenty of time to catch the fish, even at the end of the season. Early in the season sablefish could still be spawning and I don't think it is a good idea to have constant gear pressure on the stock if it isn't necessary.

I agree with ADFG comments to oppose these proposals.

Thank you.

Submitted By  
Richard Curran  
Submitted On  
12/22/2021 12:40:33 PM  
Affiliation  
self



PC298  
3 of 3

Oppose 83

Dear Chairman and Board

I first began commercial salmon trolling in 1977 and have held a troll permit since 1980. This proposal opens the flood gates to reallocate king salmon from the commercial troll fishery to charter given the fact that nonresident angler numbers continue to increase and in fact the State actively encourages this increase in nonresident anglers. It would not maintain the 80:20 split and instead would result in a major re-allocation of the limited Chinook quota to the charter industry. The proposal would eliminate inseason management of sport fish king salmon which would place all of the burden on commercial trollers to keep within the US allocation. This reallocation would seriously hurt the predominately resident commercial troll fishery and would give nonresident and charter fishermen priority over commercial trollers in low-abundance years. There is no guarantee that given climate impacts on ocean survival king salmon will return to high abundance numbers any time soon. This proposal represents a concerted effort to reallocate king salmon from commercial to sport and attempts to minimize impacts on charter fishing while once again putting the conservation burden on commercial fishermen.



**From:** [Rob Endsley](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** King Salmon Management Comments  
**Date:** Wednesday, December 22, 2021 12:56:19 PM

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Marit Carlson Van Dort, Chairman

Alaska Board of Fisheries

1255 W. 8th Street  
Juneau, AK 99811-5526

Re: King salmon management proposal 83

Chair Carlson-Van Dort and members of the Board,

My name is Rob Endsley and my wife and I own and operate Prince of Wales Sportfishing in Craig, Alaska. Our business has operated out of Craig for over twenty years and the dollars we bring into our small coastal community brings much needed sales tax revenue to the City of Craig. Sportfishing is our primary source of income and helps support my family as well as the community. We employ many locals in our business and we spend our money in town at the local outboard maintenance shop, grocery store, tackle shop, fuel dock, etc..

King salmon are critical to our operation all summer long and when our guests book a trip with us the first question they ask is, "Will king salmon be open?" If the answer is "No" many of them simply won't spend their hard-earned money to fly all the way to Alaska and fish with us. This is especially true under the current Covid atmosphere where guests are weighing the fishing benefit against the risk of travel and all the hoops they need to jump thru to get to Alaska.

Our guests that have experienced in-season king salmon closures the last few years have often declined to rebook their dates or asked to move to an earlier date with a better chance of king salmon retention being open. We would love to accommodate them earlier, of course, but there is only so much space. I know the other lodges on Prince of Wales Island face the same struggle.

I support Proposal 83 that keeps workable regulations in place during years of low abundance and strives to avoid in-season management. It would be much better for customers to have similar regulations year after year than to liberalize limits in high abundance years and get strict limits or closures in low abundance, or to close the fishery unexpectedly. It's hard to market and keep people traveling to our businesses and communities with unstable regulations. Proposal 83 also does a better job of balancing resident and non-resident limits.

Proposal 83 also incorporates the core objectives that have been used for years to manage the non-resident king salmon limits that are vital to keeping the charter industry alive in Southeast Alaska. Two of these objectives that have been recently abandoned by the department are; no in-season management, and averaging the sport harvest to provide predictability in years of



low abundance. With these two objectives back in place we could have some stability in our fishery again.

Thank you so much for the time you put into working on our fishery issues and I kindly thank you for taking my request into consideration.

Rob Endsley, Prince of Wales Sportfishing

Rob Endsley  
Prince of Wales Sportfishing  
Craig, Alaska  
[www.princeofwalessportfishing.com](http://www.princeofwalessportfishing.com)



Submitted By  
Robert Jahnke  
Submitted On  
11/13/2021 12:03:13 PM  
Affiliation

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9072478207

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Ward Cove, Alaska 99928

proposal # 148 , I am totally against this proposal that is presented by sport charters. I've been involved in Troll and sport personal use fisheries for over 50 years. In 1977 I held the world record Chum salmon well before the hatcheries here produced them. The sport charters should have been commercialized 40 years ago but our politicians here in Alaska blocked it. To compare sport charters to commercial trollers is wrong. The board of fisheries responsibility hinges on protecting the personal use Alaskan resident over the tourist industry. We have lost important rock fish, two months of putting king salmon on the table for our families [04/1-06/15], and the ability to catch halibut because of the millions of nonresident tourist coming to Ketchikan. To allow the large expansion of a terminal hatchery area for the sake of tourism is criminal. When I started personal use fishing in the early '70s there was only one resort on this Island, now there is at least 4 large resorts and at least 5 micro lodges catering to tourists. Please protect my children and grandchildren for the future by regulating the people who care much less for the Alaskan year round resident. Thank you