



Submitted By  
brad smith  
Submitted On  
12/22/2021 7:18:57 PM  
Affiliation

Phone  
5416215052  
Email  
[bradsmith@fastmail.com](mailto:bradsmith@fastmail.com)  
Address  
po box 346  
Williams, Oregon 97544

The annual herring run was always an exciting time for me growing up in Sitka. All along the shores one could fill a bucket fast just by casting a line. The energy of the whole coast seemed to be glowing with life. At the time I did not realize how vitally important this fish run is.

Herring are the food that our food eats.

After winter, all of the animals are hungry.

One doesn't have to be a biologist to see how detrimental the effects of losing the vigor of the herring run is due to managing the fishery with a skewed definition of actual value. The value of a robust annual herring population, unweakened by large-scale extraction, cannot be quantified or matched with dollars.

Many of my friends who harvest the roe along the coast have expressed that it is not as abundant as it used to be, even when the spawn is in the area. Many of the fish that feed on herring have diminished populations too.

The way this resource is extracted could be reviewed. Have you considered taking a year off? Many folks do not consider it "fishing" when you use planes and giant vacuums. This is industrial extraction.

Thank you for listening.



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

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

I am Brad Steuart, owner of Alaska's Boardwalk Lodge. We have been in business for over 20 years – through thick and thin times. We have five 28 -foot cabin cruisers which enable us to take about 20 people fishing at a time from June to October each year. In all, we serve about 400 people each year. We love this work and want it to continue to bless the lives of others for any years to come. Not only do we serve our clients but serve our community by hiring most of our staff locally. We also help local citizens and businesses by using their services in many ways to help keep our business alive. So. We contribute heavily to the commerce of Thorne Bay and the the state of Alaska.

King salmon are critical to my operation all season, and especially early. Kings are one of just a few fish that really attract anglers to come to Alaska. When the runs are low and the state limits on Kings are minimal, the interest of many in coming to Alaska are affected. Note that most of our guests are non-residents.

Therefore, I do not support Proposal 82. I'm concerned about the loss of opportunity for non-residents to keep kings in low abundance under this proposal. Attracting fisherman that support local jobs, tax bases, and economies will take a sizable hit if Proposal 82 is allowed to pass.

I do support Proposal 83 that keeps workable regulations in low abundance and avoids "inseason" management. It would be much better for customers to have similar regulations each year than to liberalize limits in high abundance years and get strict limits or closures in low abundance years, or to close the fishery unexpectedly. People spend a lot of money to come and enjoy our fishing in Alaska. It is very disconcerting for them to arrive with high expectations of a remarkable trip and to be told after they arrive that they cannot fish for Kings – that an emergency closure was just put into place.

The proposed cuts to sport regulations in Proposal 82 seem harsh from what sport fisherman have been allowed. I do support residence fishing. But believe we must also protect non-residents fishing opportunities. I believe it is important to have enough fish to support residents needs but also to keep enough opportunity for non-residents to keep Kings so they will continue to visit us in Southeast Alaska every year.

In my opinion, Proposal 83 does a better job for both resident and non-resident fisherman than does Proposal 82.

I realize that the Board is working diligently to find a fair tradeoff between all groups interested in Kings and hope that your efforts will be able to accomplish the goal of appropriately



supporting the desires of both resident and non-resident sport fishing in a manner that it can be open all season for both groups.

Sincerely Yours,

**Brad Steuart** | Owner | 801-725-9866 | [www.boardwalklodge.com](http://www.boardwalklodge.com)

**ALASKA'S BOARDWALK LODGE**

"Fishing Lodge of the Year" – *Sporting Classics Magazine*



Submitted By  
Brandon Snyder  
Submitted On  
12/19/2021 6:47:01 PM  
Affiliation  
Commercial Crabber

Phone  
907-738-1913  
Email  
[snyder.72349@gmail.com](mailto:snyder.72349@gmail.com)  
Address  
1925 Anna Circle  
Sitka, Alaska 99835

Hello Board of Fish,

My name is Brandon Snyder, I am 26 years old, and I was born and raised in Sitka Alaska and have been commercial fishing since age 13. I purchased a Dungeness permit, vessel and gear 4 years ago in 2018. That I am still in the process of paying off. Since then, I have fished all 8 open seasons based here out of Sitka and have had lifelong Sitkan's as my crewmembers. My reason for contacting you is it has been brought to my attention that there are numerous Dungeness crab proposals, in which they could close currently open crab grounds. Crab grounds that have been managed and sustained very well with great return rates! Such as proposal 201, which is one of the areas I have regularly crabbed in. The reasons I strongly **oppose proposal 201** is:

1. These crabbing grounds are very crucial to everywhere in southeast's dundy fisheries staying open, by being included in the overall catch threshold for southeast's summer seasons first two weeks total. Which indicates whether or not the fishery will open in the fall. In other words, closing these areas could dramatically effect towns across Southeast Alaska.
2. These areas are also the more safe and protected spots to crab, where many young people like myself start out to get the hang of their vessels, equipment, and how the fishery works so they can safely and properly operate.
3. Many of us local crabbers here in Sitka (myself being one) sell a huge portion of our crab locally at the docks to Sitka locals that can't go catch it themselves, many of them being elders and Sitka tribe of Alaska members that have traditionally eaten crab for generations!
4. There is already the VAST majority of Sitka's surrounding area already closed to commercial Dungeness crabbing. In which it leaves massive crabbing grounds open for sport fisherman to crab in, meaning commercial boats have to travel very far to access open waters as is, even before possibly closing more waters.
5. The waters included in proposal 201 have been traditionally fished in for over 3 decades and have proven to be the entry level to new youth learning the fishery. If these waters close it will be the beginning of this fishery diminishing to non-existence.

With that I would like to **oppose proposal 201**.

Thank you for your consideration,

Brandon Snyder – F/V Half Moon

Submitted By  
brett stillwaugh  
Submitted On  
12/20/2021 6:38:56 PM  
Affiliation



PC054  
1 of 3

Proposition 181 , As the maker of this proposal , I would like to withdrawl it from consideration . as to the reason for my withdrawl you have to look at the history of the fishery . From 2002 through 2021 there have been 3 years of substancial pink harvest . The other 16 years , the few boats fishing worked on fishing sidestripe shrimp . I spent 20 years building fresh markets for sidestripe shrimp. When the pink shrimp fishery came back in 2017 , 2019 and larger volumes of sidestripe shrimp were caught with the pinks , I experienced twice ADF&G's reluctance to open the sidestripe fishery without any valid reason other than the bioligist did not feel good about it . I believe there need to be some changes , because we have 2 fisheries competeing under one set of regulations . I also believe there needs to be more input from the stakeholders in the fishery and at this time do not think this regulation change can accomplish what is needed.

Submitted By  
brett stillwaugh  
Submitted On  
12/22/2021 5:01:23 PM  
Affiliation



PC054  
2 of 3

#### Proposal 180

As the maker of this proposal (Brett Stillwaugh) I would like to give the reasonings I arrived at in putting this proposal together . This is the only fishery in southeast Alaska , to my knowledge that has language in the regulations referring to observers . I question the need and cost of having observers in this small fishery . As I stated in my proposal , it is the cost of the obsevers and nothing to do with being observed . I welcome ADF&G to come out at any time or pull up alongside and everything is viewable . There have been stretches of time sidestripe shrimp fishing where we avg. 500.. -700.00 a day . after wages and expense ,it leaves 150.00 -200 a day . currently observer coverage is 350.00- 400 per day . double what I earn as the captain and owner of the business. As a resident local fisherman , there are few winter fishing income opportunities here . The observer law as written into the Southeast beam trawl regulations is extremely vague , to the point some ADF&G personel in my conversations believe it to be ADF&G who do the observing . This regulation was used a few years back to keep me from requesting a sidestripe opening . I was told I would have to pay for an observer if ADF&G were to open the fishery . The cost was to high and I backed off the request . I do no believe ADF&G needs this Regulation as most of this fishery has been conducted as a day fishery where we are in port every night .

Submitted By  
brett stillwaugh  
Submitted On  
12/22/2021 6:46:36 PM  
Affiliation



PC054  
3 of 3

comment on proposal 83

As a commercial troller and year round resident in southeast Alaska , we have continually taken cuts in our king salmon quotas , and now with our local stocks of concern , it is not time to expand the non resident sport fish harvest . This would likely be the outcome of this proposal . Sport harvest should be managed inseason and held to their quota as the other user groups. I oppose this proposal , as i see it as an attempt of one group to circumnavigate the 80/20 allocation



Submitted By  
Bridget Hitchcock  
Submitted On  
12/12/2021 8:06:23 AM  
Affiliation

Phone  
9077385515

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

Address  
204 Jeff Davis St.  
Sitka, Alaska 99835-7620

I have been a Sitka resident since 1993, and I am writing to strongly support proposals 156, 157, and 158. I strongly oppose proposals 159, 160, 161, 163, 164, and 165.

Even having lived here for less than 30 years, I have seen many changes in the abundance of the herring. Tlingit people have lived here for thousands and thousands of years, so I realize that the changes they have seen are far more significant. As an ally, I support their plea to conserve the remaining herring and increase future herring abundance. It is difficult to understand why a fishery that benefits few overrides a practice that is so important to not only the Tlingit culture and other sitkans that harvest herring eggs, but also to the other marine mammals, birds, and fish that eat herring to survive.

Thank you for your time and I hope you do the right thing this year.



Submitted By  
Britt Tonnessen  
Submitted On  
12/17/2021 6:25:44 AM  
Affiliation



PC056  
1 of 1

Dear Board of Fish,

As an implant in Alaska I have learned the importance of herring and heard the stories of times past of now unimaginable amounts of herring, herring eggs, and bountiful wildlife that depends on them. Also, my feeds, emails, and meetings are full of people sharing stories, recipes, and the eggs themselves. It's critical for human cultural use.

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

My understanding is that while though not enough to restore these proposals are a start.

Kindly,

Britt Tonnessen



**From:** [Hwest](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Subject:** King salmon proposals 82 and 83  
**Date:** Wednesday, December 22, 2021 6:14:48 AM

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CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Marit Carlson Van Dort, chairman  
Alaska board of fisheries  
1255 W 8th st  
Juneau, Ak 99811  
Re: king salmon management proposals 82 and 83

Chair Carlson Van Dort and members of the board,  
My name is Bruce Gipple and my wife and I own Horizon west guides and outfitters in Sitka Alaska, where we run a 4 boat, mom and pop lodge for the past 29years. Prior to this we operated on the Kenia river for 9 years before moving south.

We employ 12to 14 people in season and try to keep mechanics, construction, and a variety of Sitkans busy as much as possible year round. Sport fishing is our only income and has been for the past 44 years,( we're older than dirt). We love what we do and even though I'm 70 I can't imagine doing anything else.

I do not support proposal 82. The loss of opportunity for for non residents (95% of my business) to catch King salmon especially in the early season (may/ June)

When the main focus for them to be there is King salmon, will be devastating for my business and for the community of Sitka. I speak with some knowledge on the effects this can have on a community from my early days on the Kenia river, where the state imposed the first emergency in season closures in June back in the 1980s. We and everyone else were fully booked and with clients arriving had to inform them that they could no longer catch and keep King Salmon. Needless to say, the impact was devastating on the following years bookings with a 80% drop in revenue and was never able to recover from it, which is one of the reasons I moved to Sitka.

If the proposal 82 is implemented, it would have the same effect on our early season fisheries, which are concentrated on King salmon primarily. I estimate it would result in a 30-40% drop in revenue for my business and have a major impact on the Sitka community.

I believe that residents should have a priority and be able to catch Kings to live on, I believe that they also need money to live on and for those residents that rely on the sport fishing industry for there living, having a 30-40% drop in there income can have just as devastating effect as not having enough kings in the freezer. There has to be a balance.

I support proposal 83 as I think it's a better balance for our industry and for Alaska.

Thank you for your time and appreciate your thoughtfulness on these matters.

Bruce Gipple  
Horizon West guides  
360-600-6869  
Sent from my iPhone



Submitted By  
Bryan Lovett  
Submitted On  
12/22/2021 4:10:14 PM  
Affiliation

Phone  
9077381215

Email  
[gottalovett07@gmail.com](mailto:gottalovett07@gmail.com)

Address  
1113 Furuhelm St.  
Sitka, Alaska 99835

**I strongly support** the three proposals by the Sitka Tribe of Alaska - proposals 156, 157, 158. These proposals are designed to incorporate specific elements of traditional ecological knowledge into the management of the commercial herring fishery in Sitka Sound and will foster herring abundance, which will benefit everybody in the long run.

**I strongly oppose** proposals 159, 160, 161, 163, 164, 165, by sac roe seine permit holders and the herring seine lobby group the Southeast Herring Conservation Alliance. These proposals will lead to destructive high-grading and the renewed decimation of local stocks in the bays and inlets up and down the coast, and mark the industry's desire to expand the scope of their permits to fully capitalize on the emerging abundance of herring in Sitka and beyond.

**I further believe** that none of these proposals go far enough to affirm the fact of massive depletion of herring in the last century by commercial overfishing. This pattern has been devastating for indigenous people and coastal communities up and down the coast. The people of Southeast Alaska have been very clear for the last century in asking for an end to wasteful and destructive herring seining practices. This time of market failure for the fishery offers an ideal opportunity to take serious steps to foster abundance of herring populations up and down the coast of Baranof Island. We want wild abundance and shared prosperity for all creatures who depend on herring - not a parasitic commercial fishery.

Thank you and Gunalchéesh,

-Bryan



Submitted By  
Caleb Robbins  
Submitted On  
12/16/2021 8:28:29 AM  
Affiliation  
troll

Phone  
2088909608

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

Address  
po box 6256  
sitka, Alaska 99835

I caleb robbins a southeast alaska power troll gear card holder am in support of Proposal 89



Submitted By  
caleb robbins  
Submitted On  
12/17/2021 7:06:54 AM  
Affiliation  
commercial fisherman  
  
Phone  
2088909608  
Email  
[caleb.blufin@gmail.com](mailto:caleb.blufin@gmail.com)  
Address  
Po Box 6256  
Sitka, Alaska 99835

I caleb Robbins would like to formally oppose props 101and 103. they are harmful to the hatcehry groups in alaska that sustainably help our fleet and coastal waters. its a well managed hatchery with the eviroment in mind first and keeps up on all the proper research.



Submitted By  
Caleb Robbins  
Submitted On  
12/17/2021 8:44:55 AM  
Affiliation  
troll, shrimp pot fishery

Phone  
2088909608  
Email  
[fairweatherfishco@gmail.com](mailto:fairweatherfishco@gmail.com)  
Address  
Po Box 6256  
Sitka, Alaska 99835

i caleb robbins am in support of props 171,172,173,174

I believe there is a process/action we need to do to start helping our shrimp fisheries thrive not just survive. this fishery is managed more on what the department has time for and what aligns with people fishing schedule rather than whats good for the resource. we are harvesting shrimp in peak spawn season. Different spot prawn fisheries to the south have changed their schedule/season and are now seeing an increase in stocks.why wait till it's too late.



Submitted By  
Caleb Robbins  
Submitted On  
12/17/2021 7:21:10 AM  
Affiliation  
commercial fisherman

Phone  
2088909608

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

Address  
Po Box 6256  
Sitka, Alaska 99835

I caleb robbins would like to publicly support prop 144 I feel there is a lack of accountability among the charter groups and how the vessel is ran. I run farmers markets down south in the winter and I hear non stop different stories from fellows that have been on an Alaska guided trip and they where allowed to keep more than there limit or even the boat captain giving his share to the clients. Some clients bring so many pounds home they gloat about selling it to their friends or family to pay for their trip.



Submitted By  
Caleb Robbins  
Submitted On  
12/17/2021 7:13:21 AM  
Affiliation  
Power Troll

Phone  
2088909608

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

Address  
Po Box 6256  
Sitka, Alaska 99835

I caleb robbins would like to publicly oppose prop 82 and support props 83. the management ADF&G knows how to best manage the fleet along with sport fisherman.

keep in mind please the state at the begging wanted to allocate fish to subsistence above all then next was commercial fleet and last sport. as though the state see the instant money gained by sport the commercial fleet is an essential foundation for southeast communities. thank you.



Submitted By  
Caleb Suarez  
Submitted On  
12/17/2021 3:08:31 PM  
Affiliation  
Charter Captain in Sitka



PC060  
1 of 1

I am commenting on proposals 82 and 83 (SEAGO)

My name is Caleb Suarez. I have lived in Sitka my whole life, and can recall many fond memories of fishing with my family in Sitka Sound. Fishing is, and has been a major part of our lives as it is for many who live here. I myself make my living as a charter captain for Kingfisher Charters in the summer time, and depend on this job as a source of income to provide for my family and I.

Although king salmon catch does not directly result in income for charter fisherman, the regulations and consistency in catch are what create a stable and reliable stream of customers and revenue. Just this past year, I had several complaints from guests about king salmon being closed for a portion of the year. Several of these customers refused to rebook trips for following years during these dates. If Alaska continues this policy of completely closing the king salmon to charter fisherman, it will become increasingly difficult to book trips in the latter half of the season. I can almost certainly guarantee that by repeatedly closing, or have threat of closing, the king salmon fishery for charter and resident fisherman will hurt revenue and business for the citizens of Sitka, Alaska.



Submitted By  
Callie D Simmons  
Submitted On  
12/22/2021 5:27:41 PM  
Affiliation

Phone  
5038078068

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

Address  
206 Seward Street APT 4  
APT 4  
Sitka, Alaska 99835

Good afternoon,

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. We need to support the voices and people who have lived on Tlingit Aani since time immemorial and through whose stewardship sustained herring populations for thousands of years.

Gunalchéesh, thank you, for yor time and consideration,

Callie Simmons

Submitted By  
Carly Dennis  
Submitted On  
12/22/2021 10:48:47 PM  
Affiliation



PC062  
1 of 1

I **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.

As a young Alaskan, I strongly believe the future of our state depends on our ability to rectify the violence committed against Native populations, and to resurrect Native ways of life, which were in general both richer and wiser than many contemporary practices. The management of the herring fishery should firmly center subsistence and traditional use of herring, and should err on the side of sustainability and prioritization of herring for future generations.

Submitted By  
Carol Hughey  
Submitted On  
12/17/2021 7:11:35 AM  
Affiliation



PC063  
1 of 1

Please pass proposals 156, 157, and 158 to ensure we are managing our herring population with the needs of subsistence users in mind.

Proposals 159, 160, 161, 163, 164, and 165 all seek to maximize profits by the sac roe industry and do not engender the public benefits that our public resources should provide.



Submitted By  
Carson  
Submitted On  
12/22/2021 5:18:55 PM  
Affiliation

Phone  
9077384561  
Email  
[grantc423@gmail.com](mailto:grantc423@gmail.com)  
Address  
502 Charteris St  
Sitka, Alaska 99835

To Whom It May Concern,

My name is Carson Grant. I am nineteen years old and live in Sitka. At the age of seventeen I was given the amazing opportunity to run my father's boat for the summer commercial dungeness crab season. After two successful seasons, I decided to invest in an additional crab permit. I am concerned about the potential changes to this fishery, and the negative impact it may have on my future as a commercial fisherman.

I strongly oppose Proposal 201. If this proposal were to be approved it would take away very valuable crabbing grounds that we are currently able to utilize. Pushing our crabbing grounds farther away from Sitka is not in the best interest of anyone.

Closing the areas listed in this proposal would force much more gear into Hoonah Sound, Peril Strait, and Chatham. This will certainly lead to lost gear, disputes between crabbers, and decreased profits.

Proposal 201 directly affects the entire southeast crab fishery when deciding the length of the season. Closing down these valuable grounds would decrease the total amount of crab caught in the first two weeks of the summer season, which determines how long the season will last.

Thank you all for taking the time to listen to my concerns. I hope you will consider the negative effects Proposal 201 would have on the southeast dungeness crabbing community and our families.

Sincerely,

Carson Grant- F/V Sailor

Submitted By  
Catherine Jenkins  
Submitted On  
11/25/2021 10:24:50 AM  
Affiliation



PC065  
1 of 1

It is clear that your responsibility includes not just current fishing practices, but the future health of the fish resources of Alaska. According to the Alaska Department of Fish and Game's website, the purpose of the Board of Fisheries is the conservation and development of fisheries. The Board works with the Commissioner, whose functions are to "manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state."

It logically follows that you must **therefore approve** proposals 156, 157, and 158, which are designed to foster herring abundance and will benefit everybody in the long run. You also must reject proposals 159, 160, 161, 163, 164, and 165, which would expand the destructive practices used in commercial fishing and risk decreasing the size and health of local stocks along the coast.

Additionally, any significant decrease in the size or health of the herring population will have consequences for numerous other species that depend on the herring for food, such as salmon, whales, seals, sea lions, and multiple bird species. Each of these animals is also important for Alaskans, ranging from salmon fishing to the economic benefits of whale tourism.

As a state agency, your first responsibility is to the citizens of Alaska and the state's natural resources. But your decisions also have implications for the health of our oceans beyond Alaska's borders. I urge you to do the right thing for the herring and the people and animals who rely on them. Approve proposals 156, 157, and 158, and reject the desire of the commercial fishing industry to exploit Alaska's resources for their personal gain.

You may wonder why someone from Virginia cares enough to comment on the herring proposals. My daughter, a resident of Sitka, told me about this issue. When I independently researched the proposals before the Board and their potential environmental impact, I felt it important to advocate for the proposals that best support the long-term health of the herring population.

Submitted By  
Catherine  
Submitted On  
12/14/2021 4:54:54 PM  
Affiliation



PC066  
1 of 1

Phone  
9077380003  
Email  
[catrey1986.catherine@gmail.com](mailto:catrey1986.catherine@gmail.com)  
Address  
607 Sawmill Creek  
sitka, Alaska 99835

I have been living in Sitka, Alaska since 2015 and know how important the herring are to Tlingit people and also non native residents of this community. Not only as subsistence to eat for humans, birds and other animals but also great for our soil and for the halibut and other sea creatures that benefit from the herring food chain. I am asking that you please support for proposals 156, 157 and 158. I oppose proposals 159, 160, 161, 162, 163, 164 and 165.

Submitted By  
Catherine L Riley  
Submitted On  
12/22/2021 1:58:45 PM  
Affiliation



PC067  
1 of 1

I am writing today **in support of proposals 156, 157, and 158** which would lead to more sustainable 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.

I believe that the precautionary principal must be applied to herring management. The herring may be bountiful now, but with fast-changing ocean conditions and increasingly severe impacts of climate change, these populations could easily become stressed. Herring are critical to our way of life in Southeast Alaska and support the viability of all the other commercial fisheries that our economy depends on. The sac roe fishery is a wasteful utilization of this keystone species and the Board of Fish should endeavor to ensure that local people are able to fill their subsistence needs before permitting the mass export of this resource.





Submitter: Ceri Malein  
PO Box 3114  
Sitka, AK 99835  
Phone No: 907 7474-6255  
Email: [matthew\\_donohoe@yahoo.com](mailto:matthew_donohoe@yahoo.com)  
Submitted by: 22, December, 2021  
Subject: Comments on Finfish Proposal for 2022 BOF

To the Alaska Board of Fish:

Dear Members,

### **Comments on Covid 19**

The CDC states that even with three vaccines one should avoid large indoor gatherings, venues where mask wearing is inconsistent, or ventilation is poor. The WHO recommends that individuals over 60 should postpone travelling to areas with high community transmission. The CDC is recommending against traveling at all.

The average age of Alaskan fishermen is over 50. Ketchikan is in High Alert for Covid. The Ketchikan hospital is overflowing and turning away patients.

Many knowledgeable seniors with histories of participating at BOF are choosing not to attend the January meeting because of Covid. Their large collective bank of information will not be available. The BOF is based on Public process, without these old timer's expertise there is greater potential for flawed outcomes.

The entire world is locking down due to the new highly transmittable Omicron Variant. Omicron has the highest breakthrough rate of any Covid variant so far. This means that even if one has had 3 vaccines one can still get Covid. My husband is 72 with comorbidities. We, and many others, are **extremely concerned** about threats to my, my husbands, and the public's health by this coming meeting. Still I feel we have to attend because of the importance of the Public Processed BOF to our fishing industry. I don't like the position that not postponing this meeting puts my family in.

**Is the State of Alaska irresponsibly hosting a super spreader event and forcing Alaskans to choose between protecting their health or protecting their livelihood?**

Ceri Malein



## Here are my Comments on Proposals to the BOF that effect my industry.

### **Proposal 80:** Support

In-season Management is the way to go. ADFG has already been successfully managing this way since the new 2019 treaty deal.

### **Proposal 81:** Neutral

Using in season management all gear groups should design their fishery to enabled them to catch their allocation. If all gear groups are in agreement, allowing Trollers to mop up most of the remaining treaty Chinook quota is preferable to leaving fish on the table. Leaving fish on the table tells the Pacific Salmon treaty folks that Alaska's quota was too large and negatively effects the algorithms in the treaty model.

### **Proposal 82:** Support with amendments

If I understand the language correctly the Board should instruct ADFG Sports Department to continue using in-season management. They have been doing this successfully since the new treaty of 2019 and have not gone over allocation. With faster recording (electronic log books) there is potential room for improvement.

The requested amendment to Proposal 82, which I support, is to give Resident sport fishermen priority over non-residents.

### **Proposal 83:** Oppose

When this proposal was submitted, SEAGO's President and Vice president were the Sport Industry's representatives on Alaska's Northern Panel of the 2019 treaty team. In this forum they agreed to in-season management with a payback clause.

**All gear groups** must now adjust their management to maximize their harvest without going over their allocations because of the 2019 Agreement. If one gear group is permitted to average their catch over the years then this must apply to all groups. This is no longer practically possible. It is also impossible to catch 100% of the treaty quota every year and not go over. Since the payback clause was been enacted (2019) some Chinook have been left on the table for fear of going over. Therefore if one group is allowed to average their catch over the years other gear groups will lose out. Sport Management must make the decision of either having large Out-of-State annual bag limits in the spring with potential closures later in the year or a smaller spring Out-of-State Resident bag limit to protect the August harvest.

A smaller spring Out-of-State annual bag limit (i.e. instead of a 4 Chinook limit in 2021 when 1 or 2 could have sufficed) will have two positive outcomes;

- a) Less effort on our returning far north ranging King salmon that are now under Stocks of Concern management
- b) Allow sports fishing to remain open later in the year.



**Proposal 84; Support**

Resident preferential over non resident

**Proposal 85; Support**

Resident preferential over non resident

**Proposal 86; Support**

Resident preferential over non resident

**Proposal 88: Oppose**

Now is not the time to be massaging management plans when there are so many things in flux. Status quo with in-season management is the way to go.

- 1) On using the CPUE model to determine SEAK PST King quota. At the moment this is an experiment and will be addressed at treaty during the 5 year review meeting.
- 2) There is a law suit that is threatening to shut down all Southeast Alaskan King salmon harvest outside of three miles.
- 3) Then there's the SOC. If the time when trollers catch King salmon in the summer changes it changes the historic composition of the harvest.

**Proposal 89: Oppose**

Active permits will buy up the inactive permits first (presently there are around 300 inactive Power Troll permits). This proposal will increase gear in the water and hence increase harvest. An increased harvest will take troll harvest radically over their 61% commercial coho harvest allocation set by the Board of Fish. At present the Troll coho harvest average is 65%. Increase of gear could potentially increase catch and non-retention of king salmon and change the base line.

**Proposal 91: Oppose**

Same as on Proposal 88. Now is not the time to be massaging management plans when there are so many things in flux. Status quo with in-season management is the way to go.

- 1) At the moment using the CPUE model to determine the SEAK treaty King quota is an experiment and will be addressed at treaty during the 5 year review meeting.
- 2) There is an ongoing law suit that is threatening to shut down **all** Southeast King salmon fishing outside three miles.
- 3) Then there's the SOC, changing when trollers catch King salmon in the summer changes the harvest composition.



**Proposal 101:** Oppose

Hatcheries in SEAK have successfully supplied Salmon for all the public to harvest. This proposal hurts our local hatcheries.

**Proposal 103:** Oppose

Hatcheries in SEAK are managed responsibly and successfully supplied Salmon for all the public to harvest. This proposal hurts our local hatcheries.

**Proposal 104:** Support

Hatcheries in SEAK are managed responsibly and successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

**Proposal 105:** Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

**Proposal 106:** Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

**Proposal 107:** Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

**Proposal 109:** Support

Hatcheries in SEAK are managed responsibly have successfully supplied Salmon for all the public to harvest. This proposal improves our local hatcheries.

**Proposal 115:** Support

The annual SEAK king quota is set on a model theoretically based on 8 ADF&G Statistical weeks of winter troll harvest (week 41-48). This is a new method to predict the post season Abundance index. At present the model is only correct 50% of the time and often starts in week 42. By changing the winter start date to week 41 rather than Oct 11 a consistent number of days will be used rather than a random variable between 46- 53 days. The goal is to improve the accuracy of the model, comply with the Pacific Salmon Treaty language while not causing gear conflicts and not impact SOC which by October have already spawned.

**Proposal 121:** Oppose

Gillnets have always fished here traditionally. In the past there was no problem. Change came when new and inexperienced boaters have difficulty navigating. These rookies should respect traditional fisheries, learn the rules of the boating road, and comply, rather than expect others to change long established traditions to compensate for their lack of experience.



### **Proposal 143: Support**

Making electronic logbooks a requirement for all non-resident anglers is essential to the future of our fish stocks. There has been a growth of **corporately owned lodges** who entice their hoped for benefactors, patrons and customers with all-expense paid trips to Alaska (Golf courses on the ocean.) This type of harvesting is unrecorded. Electronic logbooks are an efficient method for collecting fish harvest data that is imperative. This will enable ADFG to have in-season, sustainable management. Without good data there is no good management.

### **Proposal 144: Support**

Making electronic logbooks a requirement for all non-resident anglers, including bareboat Charters and “non-rentals” is essential for the future of our fish stocks. Not only is it an efficient tool for collecting necessary fish harvest data it educates by pro-actively engaging visitors in Alaska and in helping the Department in conserving and monitoring our fish stocks. This will help enable in-season and sustainable management. Its Good PR too.

### **RC 6 Northern SE Stocks of Concern**

Support option A Status quo for commercial fisheries

Trollers have given up a tremendous amount of fishing time and area including most of our access to hatchery King Salmon which we pay for. More closures will result in a closed Troll fishery. The good news is the previous sacrifices are paying off. The Unuk and Chilkat are improving.

Concerns do arise on the spring increased annual non-resident sports bag limit which coincided with reduced creel sampling in the Cross Sound/Icy Straights corridor. More sampling data is needed for a better picture on what is happening there.

### **RC 7 Stikine and Andrews Creek Stocks of Concern**

Support Option A, Status Quo for commercial fisheries.

Here too Trollers have given up a tremendous amount of fishing time and area including most of our access to hatchery King Salmon which we pay for. Any more closures will result in a closed Troll fishery. The good news is, these sacrifices are paying off, the Unuk and Chilkat are improving.

Concerns arise on the spring increased non-resident annual sports bag limit. There is no creel sampling at the many private docks where guided sport boats return to throughout SEAK. This includes western Sumner Straights, and lower Chatham Straights, a Stikine SOC corridor. Presently because of inadequate creel sampling it's unclear what stocks are being caught in the guided and unguided sports industry. More data is needed for a better picture on what is happening.

Submitted By  
Chandler O'Connell  
Submitted On  
12/22/2021 3:26:28 PM  
Affiliation  
Self

**Support:** 156, 157, 158

**Oppose:** 159, 160, 161, 164, 165

The herring are foundational and irreplaceable to the Lingit culture, local subsistence, and the well-being of other critically important species, including many that are commercially utilized and have a significantly greater impact on the Southeast economy than the sac-roe fishery does. Simultaneously, we know that the current herring population in Southeast is far smaller than what it was prior to the reduction fishery, that the spawn and subsistence egg harvest in Sitka has been inconsistent and challenging, with many years where the minimum amount necessary for subsistence users has not been met, and that climate change, disease and pollution are growing threats that will have unknown consequences for this invaluable fish.

Given this, I believe that herring should be managed extremely conservatively. Moreover, I believe that there should not be a commercial sac-roe fishery on the herring in Sitka Sound.

I urge the Alaska Board of Fisheries to respect the rights of Indigenous people to practice their way of life and to food sovereignty. Please take proactive action to promote herring abundance and stewardship of the herring for generations to come.

In regards to the specific herring proposals on the agenda for the January 2022 meeting, please consider the following pieces of information, included below:

1. Rationale for supporting and opposing proposals
2. A December 16, 2021 news release from Fisheries and Oceans Canada which speaks urgently to the extraordinary conditions facing Pacific fisheries and coastal communities, including the decline of wild Pacific salmon and natural disasters impacting fish habitats, and announces a more cautious approach to Pacific herring management: "This approach will see most commercial fisheries for Pacific herring closed, and limited to First Nations food, social and ceremonial fisheries. For the Strait of Georgia, harvesting will be reduced to a 10% harvest rate, with a maximum total allowable catch of 7,850 tonnes." **I urge the Alaska Board of Fisheries to heed this precedent.**
3. A January 22, 2018 opinion piece by science writer Charles Wohlforth that ran in the Anchorage Daily News and speaks to the history of herring in Alaska, our inability to bring back herring stocks after collapse, and the need to manage herring in the context of the ecosystem. **His words are as relevant now as they were in 2018 and I hope you will keep them in mind as you weigh your decisions.**

Thank you for your public service.

## 1. Rationale for supporting and opposing proposals

**Proposals 156 - Please Support.** This proposal would implement the herring harvest control rule that is used in all areas of Southeast Alaska to Sitka Sound, creating a more gradual curve (less aggressive) to the maximum harvest limit and is intended to conserve the herring when they are at low abundance and increase opportunity for subsistence users to meet their needs. I support this goal and think this proposal is a reasonable move.

**Proposals 157 and 158 - Please support.** The Sitka Tribe of Alaska and Lingit leaders have long shared Traditional Ecological Knowledge that testifies to the importance of larger, older herring to population health and successful spawning. These proposals would provide additional protections to older fish and could help to limit targeting of older fish by the commercial industry.

**Proposal 159 – Please oppose.** Regulation 27.195 is to ensure that subsistence users have a reasonable opportunity to harvest the amount of spawn necessary for subsistence. I think this regulation is very important. If any action is to be taken here, I believe the best step would be to strengthen these words, not to remove them.

**Proposal 160 – Please oppose.** The rationale for this proposal is flawed. There is no indication that the closed area has hurt commercial fishing – indeed, 4 of the 8 years ever since 1979 in which the commercial fleet has harvested greater than 12,000 tons of herring have happened since 2012 when the core subsistence only area was established.

There was significant public testimony in support of expanding the closed area in 2018, because of the compelling need for more protections for subsistence access. Reversing this without extremely strong cause is a mistake. I also point to Traditional Ecological

Knowledge that prescribes staying quiet on the water so as not to disturb the spawning; I value the larger subsistence-only area for the chance that it can provide some relief from the loud competitive fishery.

Finally, I think it is disrespectful for the Southeast Herring Conservation Alliance to minimize in their proposal the subsistence needs of the many people and communities who must now depend solely on Sitka Sound herring in order to access eggs, a staple food for thousands of years.

**Proposal 161 – Please oppose.** The barriers for subsistence harvesters are already significant. Challenges facing subsistence harvesters include needing money for fuel, access to boats, dealing with increasingly unpredictable spawn that requires folks to drop everything or be able to leave work, spawn in hard to reach areas that require more money and time to reach when previously it was all throughout Sitka Sound, variable quality spawn that means the same amount of effort may result in less eggs harvested, state-wide dependence on the Sitka population, lack of access to necessary traditional knowledge because of reduced opportunity to participate in the harvest, loss of access due to the commercial sac-roe fishery and more. I do not think the state should create another barrier to participate in this sustainable practice that has happened here since time immemorial.

**Proposal 164 - Please oppose.** I am unsure of the impact of this proposal, but I fear that there is potential that it would increase pressure on the herring. I am concerned about the impact of catch-and-release test sets on herring morbidity and mortality and think expanding the fishing window in an equal-share quota system could increase the number of test sets completed. A longer fishing window could also lead to more pressure on older, larger herring. Finally, I don't think it is a good idea to allow permit holders to overfish their quota by up to 10% in one year (with a subsequent reduction the following year). Catching more herring earlier doesn't just remove those specific fish from the water, it also removes the chance of those fish spawning for this year and all future years. A reduction in quota the following year doesn't necessarily make up for the lost year of reproduction potential for the extra fish harvested previously.

**Proposal 165 - Please oppose.** I think we should leave more herring in the water and therefore don't support expanding the opportunity to harvest uncaught sac-roe herring quota in a winter food and bait fishery.

## 1. Fisheries and Oceans Canada News Release

<https://www.canada.ca/en/fisheries-oceans/news/2021/12/fisheries-and-oceans-canada-updates-pacific-herring-coast-wide-harvest-plan-for-2021-22.html>

### Fisheries and Oceans Canada updates Pacific herring coast-wide harvest plan for 2021-22

December 16, 2021

**Vancouver, BC** - Fisheries and Oceans Canada (DFO) supports fishing opportunities for communities, and is firmly committed to the conservation, protection, and regeneration of our marine environment and the lifeforms they sustain. Herring are a forage fish, an important food source to other keystone species like Pacific salmon, and a critical part of the ecosystem on the Pacific coast. It is vital that we manage Pacific herring with an approach that supports fishing allocation where possible, and one that is consistent with the objectives of stock recovery, and the regeneration of this important species.

Today, the Honourable Joyce Murray, Minister of Fisheries, Oceans, and the Canadian Coast Guard, announced a more cautious approach to Pacific herring management, based on recently intensified risks to wild salmon, for which herring is an important food source. This approach will see most commercial fisheries for Pacific herring closed, and limited to First Nations food, social and ceremonial fisheries. For the Strait of Georgia, harvesting will be reduced to a 10% harvest rate, with a maximum total allowable catch of 7,850 tonnes.

DFO will soon release the draft Integrated Fisheries Management Plan (IFMP), which outlines the scientific projections and proposed management measures for the upcoming season.

This decision was taken with the aim of providing sustainable fishing opportunities and increasing stock abundance, to the benefit of the entire ecosystem. This approach extends the cautious approaches taken in recent years, with additional limits on harvest, and considers the decline of wild Pacific salmon, and the impacts of the recent floods and landslides on fish habitats in British Columbia.

Pacific herring are an important food source for salmon, sea birds, marine mammals and other fish species. Maintaining a healthy herring stock is vital to the health of the ecosystem of coastal British Columbia, and this year's harvest plan will continue to conserve, protect and regenerate herring stocks for the future.

#### Quote

“When managing our fisheries, we have to consider the local fish harvesters and the long-term health of the entire ecosystem. This is an extraordinary time, when our Pacific Coast is reeling from natural disasters, and the serious damage they have caused to the environment and our iconic Pacific salmon. Herring are vital to the health of our ecosystem, and the stocks are in a fragile state. We must do what we can to protect and regenerate this important forage species.” - The Honourable Joyce Murray, Minister of Fisheries, Oceans and the Canadian Coast Guard

## 3. Charles Wohlforth Opinions Piece Anchorage Daily News

<https://www.adn.com/opinions/2018/01/22/forget-the-circle-of-life-in-this-fisheries-decision-we-are-playing-for-keeps/>

## **Forget the circle of life. In this fisheries decision, we are playing for keeps.**

By Charles Wohlforth

Published: January 22, 2018

Life doesn't go in a circle. Nature is always changing and it never comes back to exactly where it was. That's why what we do matters.

An example is the climate, which we are changing by burning fossil fuels, and the resulting northward march of the ranges of plants, animals and bugs.

The spruce bark beetle plague has made it north to the Alaska Range. We will never again live the reliably cold, snowy winters or that I remember in Anchorage 40 years ago.

Change is not so obvious in the ocean, but we can also permanently transform the magnificent and incomprehensibly complex marine ecosystem. We have done so in many places.

A century ago, herring swarmed Kachemak Bay in enormous schools that took half an hour to pass. In 1926, a biologist recorded the crazy scene in Halibut Cove Lagoon, as 50 beluga whales fed on a roiling, flashing school of fish.

"Cormorants, murre, surf scoters, and divers were there in tens of thousands, and scores of bald eagles were circling about," he wrote.

Those schools were soon fished out. They never came back.

No one alive remembers that circus of life. The packs of belugas that chased the herring run up the bay are gone, too, recorded only in local histories.

We don't know what else is missing. The machinery of the ecosystem is too complex.

Herring perform a critical role as a conduit of energy—calories—from the plankton they eat to their predators, including salmon, halibut, birds and whales. Along with obscure little fish such as sand lance and smelt, they provide forage for a vast array of creatures.

If you pull the fuel line out of a car, it won't go. But ecosystems have alternative energy routes. Kachemak Bay life survived after herring, perhaps with larger runs of the other forage fish species.

It might take decades until one of those species has a bad year and food isn't available for salmon and halibut. Then we would all scratch our heads and wonder about the bad fishing year, assuming it is a natural phenomenon, never thinking of herring.

This didn't happen only in Kachemak Bay. In the early 1980s, mismanaged commercial fishing knocked down several herring runs in Southeast Alaska that never came back.

In Prince William Sound, a rich spawn of herring in the spring of 1989 occurred amid the oil spilled by the tanker Exxon Valdez. Four years later, the run collapsed and never recovered.

The rational conclusion is that herring runs don't come back once damaged, at least not in time spans human beings are used to waiting.

The great numbers in these huge runs probably provide protection from predators. Without those swarms of fish, the few individuals left are easy pickings.

There's nothing we can do to build them back. We can't make herring swarms. Even a century without fishing may not be enough.

This week, the Alaska Board of Fisheries will decide the fate of the last great commercial sac roe herring fishery in Southeast Alaska, the famous spring explosion of life that happens in Sitka Sound.

Alaska Native groups have asked the board to reduce the commercial catch and create conservation zones around subsistence areas to exclude commercial harvest. The Assembly of the City and Borough of Sitka and the local Fish and Game Advisory Committee support the concepts.

Alaska Natives have stepped forward as protectors of the herring run because herring eggs are a traditional food used at celebrations. For countless generations their people have lowered spruce branches into Sitka Sound upon which herring lay eggs.

Years ago, I joined Chugach Natives who were gathering herring roe from kelp in Prince Williams Sound. The eggs are the essence of fresh, salty goodness, translucent, better than caviar. I can still feel them popping between my teeth.

Sitka Natives have been unable to fulfill their subsistence needs for roe five of the last seven years. But even as the run declined, a commercial fishery has continued stripping roe for sale in Japan, sending herring flesh to the grinder for use in fish farms.

It's a cultural and spiritual issue for the Natives, who face the permanent loss of an ancient practice. It's like no more turkey for Thanksgiving—forever.





Biologists for the Alaska Department of Fish and Game say they have done a good job of managing the fishery. Although the run has declined from a peak six years ago, their data show herring numbers are still above average over the long span of measurements.

It's possible, they say, that the herring are spawning away from where the Sitka Natives are looking for them. Spawning areas change.

But Natives say that's not true. Aaron Bean, an Assembly member who has worked on these issues for years, said he has a fast boat and knows how to find the spawn, and he can no longer get the eggs he needs.

In 2013, Bean asked the Board of Fisheries to add herring to a list in Alaska's Forage Fish Management Plan, which outlaws commercial fishing for these keystone species—although herring would be specifically excluded from that restriction.

"It's in the best interests of the fishermen that the fish in the ocean be able to eat," Bean said.

The board voted down calling herring what it is—and no one can dispute it is a forage fish.

I don't doubt that Fish and Game has managed herring well using the tool they have, a computer model that predicts the maximum sustained yield based on dive survey data.

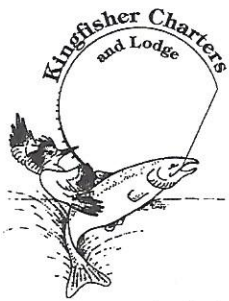
But Bean and his tribespeople are right. Maximum sustained yield is not the right equation.

Herring must be managed in the context of the ecosystem, considering their changing food supply and the species other than humans that eat them. Climate change has warmed the water, affecting plankton, and whales have multiplied in Sitka Sound, consuming herring.

The old rules of thumb may not work anymore. And getting it wrong just once could be permanent.

We can't afford more losses like that.

*Charles Wohlforth was an Anchorage Daily News reporter from 1988 to 1992, and wrote a regular opinion column from 2015 until January 2019. He is the author of a dozen books about Alaska, science, history, and the environment.*



# Kingfisher Charters & Lodge

P.O. Box 1043, Craig, Alaska 99921 • (907) 826-3350

Board of Fish Ketchikan

## Proposal 82-Opose; Proposal 83-Support

Dear Board Chairman and members,

I am owner and operator of Kingfisher Charters in Lodge, LLC in Craig Alaska. I have been in the sport fishing industry since 1990 and began our family run lodge in 1995. It has been 31 years since I started in the charter fishing industry and much has changed since then. Over the years we have seen the industry grow from a few to many which is the nature of Alaska's history, "boom to bust". As the sport fishing industry has grown the communities they support have also grown to need the jobs and dollars they bring to small communities like Craig, Thorne Bay, Klawock, Coffman Cove, and Whale Pass on Prince of Wales Island.

The years 2008 and Covid year 2020 we saw the financial depression of those communities when many non-resident sport fishermen did not come to the state. ADF&G surely saw their coffers empty without those non-resident sport licenses and King salmon stamps being purchased.

The sport charter industry needs the state to bring stability to the sport charter industry. We in the sport charter industry are asking for this stability which proposal 83 comes the closest to fulfilling this need.

From my experience in the industry in our area for King salmon we need:

1/3 January 1<sup>st</sup> to June 30<sup>th</sup>; 1/2 July 1 to July 30<sup>th</sup>; 1/1 August 1<sup>st</sup> to August 10<sup>th</sup>.

After further study I am against **Proposal 82** as I believe it will continue to keep the sport charter industry unstable with limit fluctuations. The new approach specifies sport allocations by tier instead of an 80/20 split between sport and troll over time and across tiers. It reduces the harvest opportunity for the sport industry in low abundance years. Sport management in prior plans, allowed sport to exceed 20% during low abundance and Troll to exceed 80% in high abundance years.

**Proposal 83** comes the closest to bring stability by returning the management back to earlier mechanics and clearly define it in regulation.

I respectfully ask the Board to adopt **Proposal 83** or as close to possible and define it in regulation.

Sincerely,

Charles Haydu (info@alaskakingfisherlodge.com)



Submitted By  
Charles Olson  
Submitted On  
12/20/2021 3:04:05 PM  
Affiliation

Phone  
907-738-3947  
Email  
[crolson48@hotmail.com](mailto:crolson48@hotmail.com)  
Address  
3009 Halibut Point Rd  
Sitka, Alaska 99835

Mr. Chairman and Board Members:

I am writing to Support Proposals 163, 164, and 165.

We have all been to enough Board meetings to know that it isn't very often that a proposal is designed to benefit all parties instead of just one. But proposal 163 is one that can benefit everyone associated with the herring resource in Sitka.

My name is Chuck Olson and I am what most people would call an Elder fisherman. I'm 72 years old and I have participated in the Sitka Sac Roe fishery for the past 42 years. I have witnessed the consistent improvement in the strength of the stock of Sitka herring due to the excellent management of the fishery. But I have also witnessed a fishery that is dangerous and destructive and expensive for all of those persons involved.

The Board has seen this proposal before. It has been brought before the Board several times in the past because it just makes good sense. There are three major concerns that keep coming up when we discuss the Roe herring fishery; Conservation, the cost of monitoring and conducting the fishery, and the issue of Safety. Several of the other proposals address the concerns of those who would conserve the herring stocks by limiting or restricting the fishery. The State of Alaska spends a lot of money to assess and prosecute the fishery. The Coast Guard and Enforcement also spend a lot of money to see that the fishery is somewhat orderly. And then there is the issue of safety. I have witnessed vessels ramming each other and running over each others nets in the attempt to catch the fish.

All of these problems can be fixed by simply creating a fishery that is equally shared by all of the permit holders. In an equal split fishery the permit holder can choose when and how he wishes to catch the fish or can even decide to not catch any fish at all. Those fish would remain in the water to spawn. Imagine if the Tribe or some other Conservation minded individual decided to buy several permits and not catch the fish assigned to those permits. Those fish would then spawn thereby adding to the conservation of the resource and be that much more roe to be deposited on the branches and kelp for the subsistence fishery. In an equal split fishery there would not be the need for as much Enforcement presence and involvement by the Coast Guard. I have never seen a collision or a net being run over in a cooperative fishery.

To have an equal split fishery the resource could be further conserved, the fishery would be less expensive to conduct, and it would be less destructive and safer for all persons involved. For all of these reasons the Sitka Fish and Game advisory Council overwhelmingly supported this proposal.

Further I would support Proposal 164 or some combination of Proposals 163 and 164 that the Board might find acceptable to them.

In addition I support Proposal 165 as amended by the Sitka Fish and Game Advisory Committee that would allow the Harvest of Herring for food and bait in Sitka Sound north of Cape Aspid and south of Kakul Narrows. This harvest would come out of the unharvested portion of the GHL from the Sitka Sound Roe Herring fishery. Preferably the harvest would be limited to the holders of a G01A herring permit and would be conducted in the months of October, November and December of the year of the Spring harvest of Roe herring.

Thank you for your consideration of these proposals.

Charles Olson

Submitted By  
Charles Skeek  
Submitted On  
12/22/2021 1:45:25 PM  
Affiliation  
Sitka Herring Permitholder



PC072  
1 of 1

Board of Fish Committee,

First of all, I would like to thank the board for taking the time to read everyone's comments as I can understand there have been several submitted. So thank you for time. I am writing my comment in regard to Proposals 163 and 164.

I would like to remind you all of ADFG's management of the fishery thus far and how much their science has sustained this fishery and the health of the biomass. We have witnessed the second largest spawn on record since ADFG had started recording, and by all means next year's number could possibly exceed that. We'll see. What we are witnessing is a thriving biomass and I would like to applaud ADFG for their management. All this said, I do feel the need to point out that this fishery is thriving so much, that there is an excess to market demand. Never has this fishery had such an excess that they do not need the entirety of the quota.

At this time, I do see sense in moving this fishery to an equal split management. Safety was mentioned as a reason and I can see the sense in that as that's been repeated over the years. I believe a management of this style will continue to move us into a direction of responsible harvesting. I believe it's been explained of the many benefits a season like last year has brought to processors as they were able to streamline operations at a capacity that never stopped for nearly two weeks. That just doesn't happen often in a competitive style fishery. Costs and expenses in this fishery should be considered by the board as the money earned in this fishery, if it stays in the state, benefits the state of Alaska.

On more tokenized note, I see the need to make it apparent that I am an Alaskan native. I am half Tlingit, and a second generation permit-holder of this fishery. My father Leonard Skeek was an original permit holder, and it is my desire to see that this fishery continues for more generations in our family. I do notice there are two other natives on the Board that I hope this letter reaches specifically, and my advice to them might come off as a bit harsh, but BoF meetings only come every couple of years. I remember attending my first BoF meeting in Ketchikan in 2011, I believe. I feel like I made some great comments then which I'm sure have been mostly forgotten. What I would like to remind the new board members of is some of the reasoning I heard state by some of the board members then as to why they decided to go ahead and vote in more closed area for the fishery. I'm not saying it was this particular reason, but it was stated that a young guy like myself who was able to profit off a very successful season in 2008 should have less worry about the loss of more area or shouldn't worry about more restrictions in the fishery. That statement alone should pause the two of you for a moment.

I have participated in this fishery for nearly 30 years. Nearly 30 years I have committed to this way of life as a commercial fisherman. And I did it as an Alaskan native. My father raised me in this lifestyle because he admired it and saw opportunity in it. In short, he had respect for this way of life. He also had a deep respect for cultural traditions and he ALSO raised us with subsistence traditions. So before any decisions are based on virtue signaling Alaska natives, I need to remind you of the people involved in this fishery. Though it is mostly irrelevant in my day to day life, I feel the need to point out the amount of natives that do support a living in this fishery. Permit holders, tenders, processors, restaurants, hotels, pilots - in some way or another money from this fishery supports Alaskan natives. But to base decisions as they were possibly done in 2011 where the natives involved in this fishery were viewed as well-off, and as a result could afford to lose a little, is an insult. If I could speak even more freely, if you're going to disregard the natives in this fishery this way, I do suggest that you find ways to compensate them as you are taking from their livelihood. My father entered this fishery in the late 70s on a level playing field of opportunity and it should not be disregarded as to what we've done to hold onto this permit for as long as we have. I think Alaskan natives should be working hard with what they do. Commercial fishing has provided that for me. For the board in general, if you're going to vote on the principal of giving back to Alaskan natives, and taking from others, maybe be so bold as to provide a greater direction in life for the Alaskan natives as you take away their livelihoods with decisions that keep chipping away at commercial fishing. Future generations of natives should be welcomed and introduced to the work ethic that this industry offers.

I sincerely write this letter as my own, as I am not a member of the Sitka Herring Conservation Alliance.

Submitted By  
Charles Treinen  
Submitted On  
3/1/2021 10:41:30 AM  
Affiliation



PC073  
1 of 1

Doubling up on the meeting schedule for the 2021/2022 meeting cycle puts an undue burden on the public that will limit and compromise the public's opportunity to participate in a given meeting. It also puts an undue burden on the department to produce more complete analyses when we need them to deal with day to day management issues.  
Please consider the reasonable option of setting the whole schedule back by one year.



Submitted By  
Cheryl Haven  
Submitted On  
12/13/2021 7:11:16 PM  
Affiliation

Phone  
19072207477  
Email  
[shimghet@gci.net](mailto:shimghet@gci.net)  
Address  
1170 Black Bear Road  
Ketchikan, Alaska 99901

As a 73 year old Alaska Native woman, I fear that without better protection, we may not even have a herring return one day soon. To me, herring are like the bees on this planet which are vital to our food sources - herring is the same thing, vital to our food sources. Please follow the advise of the 'Herring Protectors' of Sitka because they have spent a lot of time and worked hard to come up with a proposal guide. Thank you.

Sincerely

Cheryl Haven

Submitted By  
Chiara Dangelo  
Submitted On  
11/16/2021 6:29:52 PM  
Affiliation



PC075  
1 of 1

Phone  
2067073614  
Email  
[ChiaraLovesWater@gmail.com](mailto:ChiaraLovesWater@gmail.com)  
Address  
9642 N Douglas Hwy  
Juneau , Alaska 99801

Herring are the backbone of the traditional way of life of indigenous communities of southeast Alaska. One bad year and it could be game over for the future of our herring. Elimination of the Sitka runs is not an option. Please support Sitka Tribes proposals.



**From:** [chris guggenbickler](#)  
**To:** [DFG, BOF Comments \(DFG sponsored\)](#)  
**Cc:** [Chris Guggenbickler](#)  
**Subject:** Southeast and Yakutat fin/shellfish proposals  
**Date:** Wednesday, December 22, 2021 2:17:02 PM

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Comments on proposals 171,172,173,174

As someone who is dependent upon and has participated in the pot shrimp fishery for 39 consecutive seasons, I would like to relay my adamant **opposition** to these proposals to change the current spot shrimp season to a spring fishery. I happen to have a contrast to the departments position that a spring season would increase the harvestable amount of shrimp in the pot fishery.

First off shrimp harvested in a spring fishery would not be egg-bearing in the fall because we would have already caught them in the spring! They would not have had the opportunity to spawn anyhow.

It will take more individual shrimp to reach the same guideline harvest levels due to the added poundage of roe recovered in the fall season. (which is sought after by some markets)

Ambient air temperatures are considerably higher in the spring than in the fall which would negatively affect the market quality of the shrimp, and more importantly would increase mortality on sub market sized shrimp being returned to sea.

- Many of the markets I sell into peak around the holidays and an October fishery aligns better in timing and quality for that market.

Shrimp in the spring have light shells which freezer burn quickly, this quality issue would reduce the value of the harvest.

- Shrimp in the spring are more spread out and seasons would likely take longer to reach guideline harvest levels, for those with multiple crew and generators running freezers the expenses associated with a longer harvest would negatively affect profits.

As pot shrimp is considered a supplementary fishery, seasons will have more likelihood in the spring of conflicting with crab, troll and gillnet fisheries.

- It seems unreasonable to assume personal use/sport/subsistence users would want the commercial fishery conducted just prior to summer when most personal use/sport/subsistence fishermen are on the water.
- This truly is an allocative proposal away from those that have historic catches in the fall fishery.

Many of the departments comments for managing other fisheries reference CPUE for a reason they are not comfortable with a management shift, yet without a comprehensive plan or substantial prior test fishing seem to leave that reasoning out on these proposals. Furthermore there has been no discussion as to how this shift would be conducted, would there be a fishery in October and then the following spring, or would fishermen have to wait 18 months until they had a source of income in this fishery again? How would either one of these options create a sustainable, yet larger harvest for shrimp fishermen and the users of the State? Still opposed!

Thank you for consideration on this issue

Chris Guggenbickler  
F/V Noelani, Wrangell AK





Submitted By  
Chris Stewart  
Submitted On  
12/16/2021 1:53:36 PM  
Affiliation

Phone  
451-279-9505  
Email  
[cseptyhand@yahoo.com](mailto:cseptyhand@yahoo.com)  
Address  
885 32 Ave.  
San Francisco, California 94121

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

There used to be bountiful spawning herring populations throughout Southeast. But in the last 50 years, spawning grounds from Kah Shakes to Lynn Canal have collapsed under ADF&G management ... and not a single one has yet recovered. Herring are a keystone forage fish species and critical food for salmon, as well as other economically and culturally important species like humpback whales and harbor seals.

While the proposals being considered by BoF next month are not enough to undo the collapsed herring populations across Southeast, they are an important first step in protecting Sitka Sound's population — the last best herring spawning grounds in the region.

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

Submitted By  
Christine Woll  
Submitted On  
12/22/2021 8:50:28 PM  
Affiliation



PC078  
1 of 1

Phone  
3397931835  
Email  
[christine.L.woll@gmail.com](mailto:christine.L.woll@gmail.com)  
Address  
1300 Mendenhall Peninsula Rd  
Juneau, Alaska 99801

I am writing to support measures put forward by the Sitka Tribe of Alaska and Herring Protectors. I have a masters in fisheries from UAF and have lived in Southeast Alaska for almost a decade. The truth is herring used to spawn in so many areas across Southeast and all but a few remaining events remain. More of the same management won't work; we need to try new conservation approaches that rely on the wisdom of the people who managed these resources for thousands of years without eradicating their resources.



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

Re: King salmon management proposals 82 and 83

Chair Carlson-Van Dort and members of the Board,

My name is Chuck McNamee. I began working in the sportfishing industry in Sitka at the age of 19 in 1993. In 1996 I became a captain working for Angling Unlimited. Over the years, I became a full partner in the business. In 2021, I put my family's future on the line and finished a buy-out of the retiring founder of Angling Unlimited. Our business employs over 25 workers in season. We have captains who own their own boats, live in Sitka, and support their families on their earnings from guided sport fishing. We also own boats with hired captains.

We buy the overwhelming majority of our supplies locally. We purchase our fuel from the local dock and the local mechanic repairs, maintains, and provides parts for our engines and drives. Our business helps support the Sitka tax base via a 6% sales tax, a bed tax, and a fish box tax. We don't serve dinner to our guests who either spend money at the local grocery store to cook in or go out to the restaurants in Sitka.

Kings are the premier sportfish because of their size and fight. Not a single guest gets aboard our boats who doesn't hope to catch and keep a king salmon. These are one of the greatest eating fish on the planet. We are especially dependent on kings to market our season in May and June when other salmon species aren't available. The promise of a king in July and August remains important in attracting customers. A mismatch between that dream of a king that attracts a customer and a sudden regulatory change tends to leave a sense of uncertainty that threatens the return business we so heavily rely on to keep our lodge full and contribute to the local economy.

The past two seasons saw king salmon regulations swing wildly from ever increasing bag and annual limits in 2020 to a complete closure in 2021. A level set of regulations would work much better for our customers and allow for the Alaskan fishing experience to match the expectations they have when booking. We don't need super high bag and annual limits during high abundance. We do run into real disappointment when the regulations change suddenly downward in season when abundance may be lower.

We at Angling Unlimited do not support Proposal 82. We're concerned about the impacts of lost opportunity for non-residents to retain kings in low abundance under this proposal. While we understand that in season management is an attractive management tool, we see it as a very last resort due to the destructive marketing impacts on customers who don't want to invest in a trip with highly uncertain opportunities. Building and maintaining a stable business that predictably supports local jobs, tax bases, and economies requires suitable and stable limits at all abundance levels.

We support Proposal 83 which provides workable regulations in low abundance and avoids in season management. We prefer long term stability in regulations to a whipsaw up and down chasing high abundance with liberalized regulations which our customers don't require, followed by highly restrictive limits or unexpected closures in low abundance. The commitment of money, time, and travel our customers make is undermined with overnight regulation changes. We feel a regulatory regime that creates greater certainty will help Angling Unlimited continue to employ workers in Southeast and support the local economy.



Additionally, we support allocating enough king salmon to the sport fishery to assure resident access throughout the season at all levels of abundance. We believe Proposal 83 will do a much better job of assuring resident access while providing enough opportunity for non-residents. The direct benefit to the resident angler to harvest kings should be assured. We also feel the board should consider the benefits non-resident harvest provide to countless residents of Southeast Alaska in jobs, expenditures in local businesses, and the tax base of the communities. Proposal 83 does a better job of addressing all these considerations.

We trust the Board will find a fair and creative solution that serves all groups that depend on the precious king salmon resource with workable regulations during low and high abundance. Such a solution serves those in each user group and they will ultimately provide the maximum benefit of this resource to the State of Alaska.

Thank you for taking my comments into consideration.

Chuck McNamee

Submitted By  
Cindy E Stiles  
Submitted On  
12/22/2021 10:04:53 AM  
Affiliation  
Tlingit tribal member



PC080  
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.

Pacific herring are a keystone species, which salmon, sea mammals and other marine wildlife depend on, yet I don't think that our current policies reflect Herring 's role in our oceans as a forage fish. This significant position that the Herring hold in the ecosystem needs to be carefully addressed with care and nuance.

I believe we must go even farther if we are going to protect Herring populations for the future generations.

Sincerely,

Cindy Stiles

Tlingit tribal member/Sitka Native



Submitted By  
Cindy Wagner  
Submitted On  
12/19/2021 3:30:25 PM  
Affiliation

Phone  
9076171866

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

Address  
POBox 369  
Metlakatla , Alaska 99926

For generations, the Alaska Department of Fish & Game has proven itself to be incapable of managing any fishery, particularly the herring and ooligan fishery. Their management of these particular fisheries have been devastating to Native communities that depend on them. At least two generations of Native peoples have not tasted ooligan. Kah Shakes and Cat Island were always productive for herring eggs for the Native People, Behm Canal had a small herring spawn. Hobart Bay and Seymour Canal were also herring spawn areas, all gone from overfishing, i.e. poor management. None of these areas have recovered. Sitka herring spawn needs to be allowed to recover. The People need to have a herring spawn in order to continue as they have for millennia. The People also need their ooligan. Start listening to the indigenous way of life.



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #93 dealing with the harvest annual limits for nonresident sport fishers in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

King salmon, like other traditional foods that inhabit our southeast Alaskan waters, is critically important to a lot of people that live here in Ketchikan. Relatively speaking, king salmon in our area is “easy” to access because we can harvest near our community during certain times of the year. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell

Lee Clere





Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #142 dealing with harvest regulations and guidelines for Ooligan (Eulachon) on the Joonax (Unuk) River. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Ooligan for generations have been critically important for our peoples culture here in the Ketchikan area, and for years we legally have not been able to harvest this traditional food in state managed waters. We would ask the Alaska Board of Fisheries to protect my rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell

Lee Clere



Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens writing to you to express our support for Board of Fisheries proposal #146 dealing with harvest regulations and guidelines for nonresident sport fishing for salmon in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

By and large, all of our fisheries for all five species of Pacific salmon are experiencing high variability throughout the years which is concerning for the management of these fisheries. It is imperative that we manage this resource for sustainability while giving priority to the citizens of Alaska. We need more fish to escape to their natal streams such that they can contribute. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell

Lee Clere





Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of writing to you to express our support for Board of Fisheries proposal #147 dealing with harvest regulations and guidelines for nonresident sport fishing for salmon in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

By and large, all of our fisheries for all five species of Pacific salmon are experiencing high variability throughout the years which is concerning for the management of these fisheries. It is imperative that we manage this resource for sustainability while giving priority to the citizens of Alaska. We need more fish to escape to their natal streams such that they can contribute. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn

Ivan Leighton



Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell

Lee Clere

Hilary Rifenburg



Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeramiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green

Torah Zamora



Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens writing to you to express our support for Board of Fisheries proposal #148 dealing with harvest regulations and guidelines for nonresident sport fishing for salmon in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

By and large, all of our fisheries for all five species of Pacific salmon are experiencing high variability throughout the years which is concerning for the management of these fisheries. It is imperative that we manage this resource for sustainability while giving priority to the citizens of Alaska. We need more fish to escape to their natal streams such that they can contribute. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

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Dawna L Hull

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Helene R. Simpson

Susan Lee Pickrell

Lee Clere





Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #156 dealing with commercial harvest rates of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We believe that this proposal is a valid and responsible way of assuring that these herring will be here for generations to come. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis



Gloria Burns

Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

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Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson



Susan Lee Pickrell

Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

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Myrna Chaney

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Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

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Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

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Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie



Wendy walker

Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #157 dealing with commercial harvest rates of various age classes of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We believe that this proposal is a valid and responsible way of assuring that these herring will be here for generations to come. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis



Gloria Burns

Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

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Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson





Susan Lee Pickrell

Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

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Katherine Evans

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Myrna Chaney

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Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

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Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie



Wendy walker

Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #158 dealing with commercial harvest rates of Pacific herring with respect to size and age in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We believe that this proposal is a valid and responsible way of assuring that these herring will be here for generations to come. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis



Gloria Burns

Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson



Susan Lee Pickrell

Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie



Wendy walker

Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #159 dealing with commercial harvest rates of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal disproportionately negatively impacts the subsistence harvesters of herring eggs. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell





Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #160 dealing with commercial harvest of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal disproportionately negatively impacts the subsistence harvesters of herring eggs. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

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Teri lee Tesk

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Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

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Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

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Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #161 dealing with subsistence permit requirements of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal disproportionately negatively impacts the subsistence harvesters of herring eggs. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell





Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #163 dealing with commercial harvest quotas of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal has the potential to make the herring fishery in this area more unsustainable than ever before. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell



Lee Clere

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Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

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Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #164 dealing with commercial harvest quotas of Pacific herring in the Sitka Sound area. One may think that this is out of our “jurisdiction” but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal has the potential to make the herring fishery in this area more unsustainable than ever before. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

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Dawna L Hull

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Hal E Smith

Helene R. Simpson

Susan Lee Pickrell





Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

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Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our opposition for Board of Fisheries proposal #165 dealing with commercial harvest of Pacific herring in the Sitka Sound area. One may think that this is out of our "jurisdiction" but we have a number of people that travel from Ketchikan to Sitka every year for the herring harvest in that area. This proposal has the potential to make herring fishery in this area more unsustainable than ever before. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

Pacific herring in southeast Alaska provide a number of environmental, cultural, and economic benefits to our waters. The Sitka Sound herring spawn is one of the most important to the people of southeast Alaska and must be conserved with every resource that we have. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

Irene Dundas

Cheri Blair

Myrna Chaney

Brita M. Alander

Jeremiah Blair

Jasmine Blair

Dan Nelson

Lisa Maria N. DeWitt-Narino

Jeremiah Blair Jr

Trixie Bennett

Gerry Balluta

Kayla Williams

Terri Burr

Christeen Jackson

Melanie Griffin

Anthony Chulik

Amy welty

Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens writing to you to express our support for Board of Fisheries proposal #170 dealing with traditional and customary use designation for all beach seafood in southeast Alaska. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

The Indigenous people of southeast Alaska have been using shoreline for dietary and medicinal uses since our people have existed in this area. A saying in our culture that has been prevalent through time is “when the tide is out the table is set.” This is something that I hold in high regard in my life. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns

Any Guinn



Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

Lucas Ramsey

Riley Boss

Daniel Edenshaw

Byron Wallace

Maxx Keizer

Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell

Lee Clere





Hilary Rifenburg

Karen Kennedy

McKenna Sutton

Bianca Adams

Erica R Hoff

Danielle Ludwigsen

Katherine Evans

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Cheri Blair

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Kayla Williams

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Melanie Griffin

Anthony Chulik

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Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker

Patti Green



Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Greetings to the Alaska Board of Fisheries Board Members,

We are citizens of Ketchikan writing to you to express our support for Board of Fisheries proposal #234 dealing with requiring for catch and harvest reporting for all sport fishing activities for all finfish and shellfish. Now more than ever the state of Alaska needs to prioritize the harvest by the citizens in Alaska so that we can provide for ourselves and our families.

The Alaska Department of Fish and Game needs every opportunity to make proper in season management decisions for the sustainability for all species within Alaskan waters. Having these records being reported by all nonresidents would be a major step in the right direction. To assure this happens, there needs to be some sort of impactful enforcement so that people are not neglecting providing this information to the managers. We would ask the Alaska Board of Fisheries to protect our rights as a citizen of Alaska to harvest traditional foods that are culturally important to us, our families, and our community.

Thank you for your time and consideration,

Marissa Medford

Deborah A. White

Jessica Albertsen

Rob Sanderson Jr.

Michelle Eakman

Heather Evoy

Margaret Edais Yeltatzie

Naomi Michalsen

Tony R Gallegos

Keenan Sanderson

Treasa James

Erin Weis

Gloria Burns



Any Guinn

Ivan Leighton

Mischa Chernick

Margaret Edais Yeltatzie

Jessica Miles

Naomi michalsen

Teri lee Tesk

Nadine Robertson

Michelle Y. Charles

Elaine Atkinson

Averie Archibald

Helene Simpson

Bonnie Morris

Beverly Chalmers

Elizabeth Rado

Simeon Cabansag

Julian Kvasnikoff

Grant EchoHawk

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Dawna L Hull

Sonya R. Klippert

Hal E Smith

Helene R. Simpson

Susan Lee Pickrell



Lee Clere

Hilary Rifenburg

Karen Kennedy

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Shaun Dunkin

Willard S Jackson Sr

Elma M. Guthrie

Wendy walker



Patti Green

Torah Zamora

Izaak Pawlik-Jensen

Hannah Keith

Gunnar Keizer

Blake Bachant

Eric Burke

Barbara Berrisford

Clarence Peele



Submitted By  
Claire Manning  
Submitted On  
11/16/2021 7:49:37 PM  
Affiliation

Phone  
3609222167

Email  
[Cemanning0413@gmail.com](mailto:Cemanning0413@gmail.com)

Address  
477 s 21st pl  
Ridgefield , Washington 98642

I am a teacher and I support the Sitka Tribe of Alaska's proposals to make all herring management consistent across the Southeast.



Submitted By  
Claire Sanchez  
Submitted On  
12/21/2021 10:05:55 PM  
Affiliation

Phone  
6308185960

Email  
[Sanchez.claire.marie@gmail.com](mailto:Sanchez.claire.marie@gmail.com)

Address  
504 Shennett st.  
Sitka, Alaska 99835

Dear Board of Fish,

Due to herring's importance culturally, ecologically, and importance to subsistence users, I support Sitka Tribe of Alaska's proposals: 156, 157 and 158.

I oppose proposals 159 through 164, because they're harmful to herring and subsistence users.

Thank you,

Claire



Submitted By  
Clyde Curry  
Submitted On  
12/22/2021 11:37:10 PM  
Affiliation



PC085  
1 of 1

December 22, 2021

Members of the Board of Fisheries,

My name is Clyde Curry, and I fished the Sitka herring sac roe fishery from the beginning. I started fishing in Alaska in 1963 and I finally fully retired in 2017. As a child, I grew up fishing on Lummi Island in Puget Sound at my family reef net operation. My brother and I began gillnetting salmon when I was 12, and by the time I was 16 we bought a boat and headed to Alaska. In 1966, we purchased our first salmon seine boat, the Puget, and fished it together in Southeast Alaska. I bought my own salmon seiner, the Louie G in 1968. In 1970, I married a local Petersburg fisherwoman, and we began building a business and started a fishing family.

My first experience with herring was on the tender Howkan around 1970 in Sitka, and at that time it was just a bait fishery. The season was just- open, so people could fish whenever they wanted- guys were too impatient to wait for the roe to ripen up, so it all went to bait for halibut. I went on the Howkan to Prince William Sound since the fishery up there was just getting started. I took my own seiner the Louie G to Sitka around 1972 or 1973 to fish herring sac roe in Sitka. After that, I also started fishing herring in Auke Bay, Seymour, Behm Canal and other areas. I fished herring in Ketchikan, Sitka, Juneau, Prince William Sound, Resurrection Bay, and Togiak. All those fisheries were managed differently than Sitka.

Sitka herring started as a small group of about five of us, and the fishery grew really fast after that. I was one of the initial issuants when the sac roe fishery went limited entry. When I first started going to Sitka before limited entry, I saw no effort to harvest roe on branches. When the sac roe fishery started there were many Alaska native permit holders. I can remember 9 off the top of my head. Later on, the native permit holders would harvest roe on branches to bring back to communities. That doesn't happen as much anymore.

I've watched the Sitka herring fishery go through ups and downs. There was NOT as much fish when we started the fishery as there is now. Past ADF&G managers can also tell you that I didn't always agree with the way they were managing the fishery. But that doesn't change the facts, that they keep the fish coming back. From the early 1970's to the early 1990's the biomass was small, nothing like it is today. After the Sitka pulp mill closed in 1993, I watched as the herring population really started to take off. Herring also got a lot bigger after the pulp mill closed. They were able to grow larger and live longer. Just look at the yearly graphs from the beginning of the fishery, and you'll see the increase in the size of herring and population after the pulp mill closed.

You're going to be asked to make changes to this fishery. Don't do it. We have already made big changes, and it's never enough. The compromises made only take away from the fishery. The people who want to shut the fishery down have already taken area away and they want to take more. They won't stop until they close the fishery down.

Thank you, Clyde Curry



Submitted By  
Elsa Sebastian  
Submitted On  
12/22/2021 6:54:38 PM  
Affiliation

Phone  
8025952600

Email  
[elsa.m.sebastian@gmail.com](mailto:elsa.m.sebastian@gmail.com)

Address  
2116 SAWMILL CREEK RD  
Sitka, Alaska 99835

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.

-Colin Arisman



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 Ketchikan, Alaska, and I participate in the sport salmon fisheries of the Southeast region. I worked up here multiple times, now have moved here and will be a resident by next summer. Salmon is why I moved here because fishing in Washington state (where I'm born and raised) has been destroyed by lack of hatcheries. I moved here to follow my dreams of being a charter fisherman, thus fish is a direct factor in my livelihood.

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,

Connor Sorensen  
connorsorensen97@icloud.com  
(425) 301-5716

Submitted By  
Courtney MacArthur  
Submitted On  
12/21/2021 7:20:27 PM  
Affiliation



PC088  
1 of 1

I support Proposals 156, 157 and 158, and I oppose 159, 160, 161, 163, 164 and 165.



Submitted By  
Timothy O'CONNOR  
Submitted On  
11/12/2021 3:30:59 PM  
Affiliation  
Ata,troller, mayor of Craig  
  
Phone  
541-601-5941  
Email  
[bestreekiller@msn.com](mailto:bestreekiller@msn.com)  
Address  
Po box1225  
Craig , Alaska 99921

Hatcheries are a critical part of Alaska fisheries, be it commercial, sport, substance or charter. They help support all of these industries, families communities and economy's in Alaska. As Mayor of Craig Ak.and a troller and substance fishermen, I'm very aware of the impacts our hatcheries have. We have grown our fleets in the Craig area and continue to expand opportunities here because of our hatcheries. The state salmon catch valued at over 650 million dollars in 2021 and probably over 1/2 of that was with the help of our hatcheries. We view them as critical inferstructur to our success as a community. Thank you for your time Tim O'Connor Mayor of Craig Ak. And fishermen.



Submitted By  
Tim O'Connor  
Submitted On  
12/13/2021 10:58:32 PM  
Affiliation  
Mayor,ATA, Commercial fishermen  
  
Phone  
541-601-5941  
Email  
[Mayor@craigak.com](mailto:Mayor@craigak.com)  
Address  
Po box1225  
Craig , Alaska 99921

Our hatcheries are essential to the community's and the industry in Craig as well as subsistence way of life of the Tribes and people of Prince of Wales is.... our hatcheries contributions to our way of life and economy is essential to our communities. As mayor of Craig I am very involved in the support of our fisheries for economy. Our sport, charter , trolling, gillnetters and sainers all benefit millions of dollars and subsistence lifestyle.

Submitted By  
Cristen Kimball  
Submitted On  
12/22/2021 3:27:27 PM  
Affiliation



PC090  
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.





Submitted By  
Daniel Cannon  
Submitted On  
12/22/2021 9:08:47 PM  
Affiliation

Phone  
4407244716

Email  
[dgc4306@gmail.com](mailto:dgc4306@gmail.com)

Address  
1420 glacier Ave  
Apt 201  
Juneau, Alaska 99801

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.



Submitted By  
Daniel F Castle  
Submitted On  
12/22/2021 7:58:55 AM  
Affiliation

Phone  
9076175500

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

Address  
4430 S. Tongass Hwy  
Ketchikan, Alaska 99901

In general, the solutions offered in proposals 156, 157 and 158 are for problems that do not exist and I OPPOSE them. There are no allocation or conservation issues that the board needs to address at this time. If adopted, these proposals would eventually dismantle the fishery and deprive the fishermen and citizens of the state of a robust and valuable resource. As stated in each submission, total abolition of the fishery was considered to be an option and should awaken you to their true intention. Proposals 159 and 160 I SUPPORT. These proposals reverse decisions made by previous boards that attempted to solve other phantom problems. I agree that some shelter should be afforded to facilitate subsistence harvest, but expansion of the "core area" has done nothing and will continue to do nothing to help fulfill local needs. Commercial harvest can sometimes "spark" the beginning of a spawning event. By pushing the fleet away from town, the intense schooling needed for good branch coverage gets farther out of reach. In other words, the solution has backfired and only makes matters worse. I SUPPORT proposals 163 and 164. Adoption of the equal share concept will solve many economic problems and relieve difficulties that fisheries management must face yearly. EHS fishery will produce higher quality product, which in turn will deliver higher value to fishermen, processors and the State. EHS will eliminate destructive collisions and reduce insurance claims. EHS will also greatly reduce the heavy cost of management to the Department. In addition, EHS will reduce the impact that a competitive fishery has on the resource. An orderly fishery will promote more stability and enhance subsistence opportunities.



My name is Darell Welk. I own and operate Alaskan Fishing Adventures~Ketchikan. We have been running our family business for 27 years and live year round in Ketchikan. Our business is heavily reliant on king salmon to keep us operating. Changing yearly bag limits and mid season king salmon closures on low abundance years are making it increasingly difficult to attract and get guests to return to our state.

Imagine saving up all year for what is the family trip of a lifetime. After you buy your plane tickets they inform you that Disneyland is still open, however the rides are not. This is what we are having to explain over and over to these families. To find some sort of balance to our limits like proposal 83 offers will keep visitors coming back and spending their vacation dollars in our beautiful state. Prop 83 does a good job of providing opportunities for residents and nonresident anglers without extracting from but rather borrowing from other fisheries in low abundance years and repaying them back in high abundance years. My hope is that the board can come up with a fair tradeoff between king salmon user groups that benefit all. I believe prop 83 does this. Thank you for taking the time to read this. Darell Welk



December 21, 2021  
Darrell Kapp

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

Re; Support for Proposal 166 and 233: An alternative gear for GO1A permit holders using open platform Spawn on Kelp methods. And, remove districts 13A and 13B from L21A administrative areas

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

Attached is my letter to the Commercial Fisheries Entry Commission (CFEC) of February 26, 2020 that sums up the dispute we are having with the CFEC.

Attached also:

1. the Certified letter to me, Darrell Kapp, from the CFEC dated February 27, 2020.
2. the letter of February 19, 2020 from CFEC to me, Darrell Kapp.
3. The letter of February 10, 2020 from Darrell Kapp to CFEC
4. A map of SE Alaska herring stock areas.
5. Seth Beausang Memorandum

Please review all the documents you received and ask the CFEC to remove districts 13A and 13B from the L21A administrative area.

A third letter from the Board of Fisheries to the CFEC could be the push the CFEC needs. Once areas 13a and 13B are removed, the BOF can allow the GO1A fishermen the choice of purse seining their herring or doing an open pound alternative in areas 13A and 13B.

Best regards,  
Darrell Kapp

A handwritten signature in cursive script that reads "Darrell Kapp".



February 26, 2020

Fate Putman, Chairman  
Dale Kelley, Commissioner  
Commercial Fisheries Entry Commission  
8800 Glacier Highway, Suite 109  
PO Box 110302  
Juneau, Alaska 99811-0302

Dear Chairman Putman and Commissioner Kelley,

Thank you for your letter of February 19, 2020 and the accompany documents. We are disappointed in your statement, "we do not believe that a meeting at this time would be fruitful."

Looking at the "Chronology" document you sent us, we find the work titled "Open Platform Spawn on Kelp," by Phillip Mundy PhD, John Gissberg PhD, and Samuel Sharr BS, was not included. This was the first document we presented to the Board of Fisheries (BOF) at the Juneau meeting in 1997. Phil was the Chief Fisheries Scientist for the Alaska Department of Fish and Game and John was an Attorney with a PhD in fisheries science, and has served in State of Alaska positions in fisheries science, law and policy.

At that meeting the Board liked the concept we presented but when drafting the rules, we stopped them because the rules they were talking about were not sufficient to conduct a successful fishery. They tabled the rules to be taken up at the Sitka meeting the next month.

At the Sitka meeting we did not have a large presence because a lot of our proponents were fishing. The opponents were also given the month between meetings to organize and object to the proposal. In drafting the rules, the BOF made the pound size so restrictive that when Dan Coffey told me the ideas, I said to Dan that even I would not leave seining herring for pounding and I have all the equipment. Dan walked away miffed because the plan wasn't working and the proposal was voted down. Looking back, it was a mistake to not accept the plan because it could have been modified in later years and we would not be having to request a meeting with you.

We are concerned the overlapping area of Go1A and L21A was not implemented properly. You state, "A review of that record shows that the administrative area for Northern SOK fishery was specifically designed to provide managers with the flexibility to open subdistricts when and where the resource is healthy and surpluses exist." Yes, the design of the action was to allow the Northern SOK access to subdistricts, But the Subdistricts of 13-A and 13-B was already designated a Limited entry fishery GO1A on the Sitka herring stocks. This subdistricts 13-A and 13-B should have been withdrawn from the large area provided by CFEC. The CFEC should never have added more users to an already Limited Entry herring stock that was designated limited in 1977 and in 1992 had an optimum study. Eighteen years later the CFEC adds more users to the Sitka herring stock without any study or thought that creating more limited entry permits would put even greater pressure on the existing fishery management system.

You also say "That it was not fair to remove SOK permit holders from Sitka Sound when they had purchased permits in the fishery with the expectation of fishing in that area as permitted by ADFG managers". The idea that folks invested in Northern ROK permits for future access to Sitka surplus is



not believable. If that were truly the case there would've been Board proposals asking for access many cycles ago. The action by Seth Beausang, Assistant Attorney for the State of Alaska Department of Law (DOL), (Memorandum 2015 and Memorandum March 4, 2016) stating Northern pounders have access to Sitka stocks encouraged the thought, Northern pounders have access to Sitka stocks. This suggests CFEC did not act in the best manner when they failed to exclude the Sitka districts 13-A and 13-B from the L21A overlapped area when establishing L21A limited entry.

The Statewide Management for Pacific Herring information states; "Most herring fisheries in Alaska are regulated by management units or regulatory stocks (i.e., geographically distinct spawning aggregations defined by regulation). Those aggregations may occupy areas as small as several miles of beach or as large as all of Prince William Sound. Herring sac roe and spawn-on-kelp fisheries are always prosecuted on individual regulatory stocks."

The Alaska Board of Fisheries has asked the CFEC twice to separate the Sitka herring subdistricts from the large Northern pound area. The fact that the BOF made a second request to remove the subdistrict 13-A and 13-B from the overlapping L21A area should be more than sufficient to suggest to CFEC that the Board wants this action taken. You are not complying with that request because you say you have not received any new information that would compel you to have another hearing. We would like you to reconsider that position.

Best Regards  
Darrell Kapp

A handwritten signature in black ink that reads "Darrell Kapp".

cc: Ryan Kapp [kappjr@comcast.net](mailto:kappjr@comcast.net)  
Alan Otness [adotness@gmail.com](mailto:adotness@gmail.com)  
Joe Lindholm [redrivertfisheries@comcast.net](mailto:redrivertfisheries@comcast.net)  
Charles Treinen [cwtreinen@aol.com](mailto:cwtreinen@aol.com)  
Reed Morisky [reed.morisky@alaska.gov](mailto:reed.morisky@alaska.gov)>  
John Barry [pillarbay@gmail.com](mailto:pillarbay@gmail.com)

Attachments (3)



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

### Commercial Fisheries Entry Commission

400 Westering Way, Suite 100  
PO Box 10040  
Juneau, Alaska 99801-0040  
Phone: 907-586-6161  
Fax: 907-586-6162

February 27, 2020  
CERTIFIED RETURN RECEIPT  
7018 3090 0001 1079 4280

Darrell Kapp  
338 Bayside Rd.  
Bellingham, WA 98225  
Via Email: Kapp\_D@msn.com

Dear Mr. Kapp:

The Commercial Fisheries Entry Commission (CFEC) received your February 10 and 26, 2020 requests to remove subdistricts 13-A and 13-B from the administrative area for the Northern Southeast Spawn on Kelp Pound Fishery (L21A).

CFEC has reviewed the request and appreciates your feedback and concerns. Nevertheless, at this time your request is denied for the reasons described in the attached correspondence, dated February 19, 2020.

By Direction of the

Commercial Fisheries Entry Commission

Fate Putman  
Chair

Dale Kelley  
Commissioner

Attachments (1)



THE STATE  
of **ALASKA**  
GOVERNOR MIRE DUNLEAVY

Commercial Fisheries Entry Commission

1000 West Northern Blvd., Suite 100  
Anchorage, Alaska 99503  
Phone: 907-267-2000  
Fax: 907-267-2001  
www.adfg.state.ak.us

February 19, 2020

Darrell Kapp  
338 Bayside Rd.  
Bellingham, WA 98225  
Via Email: Kapp\_D@msn.com

Dear Mr. Kapp:

CFEC is in receipt of your February 10, 2020 letter expressing continued interest in utilizing open pounds as alternative gear for the Sitka sac roe seine fishery.

Attached you should find our most recent correspondence on this matter to the Board of Fisheries (BOF). As you are aware, your request ultimately involves more than a simple change of administrative area for the Northern Spawn on Kelp (Northern SOK) fleet. Additionally, it should be noted that the administrative area for the Northern SOK fishery was established after a comprehensive research and administrative process, including public comment. A review of that record shows that the administrative area for the Northern SOK fishery was specifically designed to provide ADFG managers with the flexibility to open subdistricts when and where the resource is healthy, and surpluses exist. Over the approximately 20 years since the boundaries of the Northern SOK fishery were drawn, new entrants have purchased permits with the knowledge that all Northern Southeast Inside districts fall within those administrative lines and could potentially be opened for harvest.

Nevertheless, in 2015, at the request of the BOF, CFEC proposed a regulation which would have redrawn the Northern SOK boundary and removed from those permit holders any future harvest opportunity in Sitka Sound. As part of that process, CFEC solicited comments and held a public hearing specific to the question of whether the administrative area should be modified.

Many permit holders made the time to travel to CFEC to comment in person or to comment by telephone; many written comments were also received. With the single exception of the principal proponent, Ryan Kapp, commenters were uniformly and steadfastly against the proposal.

Commenters made many arguments against the proposed area change, and most of them also chose to state during personal testimony their thoughts on the tabled BOF proposal that prompted BOF to request that CFEC modify the area. The hearing participants argued: 1) that it was not fair to remove SOK permit holders from Sitka Sound when they had purchased permits in the fishery with the expectation of fishing in that area as permitted by ADFG managers, 2) they argued that, if anything, the open pound concept is more compatible with fishing methods historically utilized in the SOK fishery than those historically used by sac roe seiners; 3) they argued that, removing one gear group from a potentially lucrative area for the benefit of another gear group would be





inconsistent with the principles of the Limited Entry Act and set bad precedent for any fisherman who has invested in a limited entry permit; 4) they argued that the ultimate end of the proposal, to introduce open pounds in Sitka Sound, could result in a glut in low grade product on the market which could be detrimental to pounders and sac roe fishermen alike; and, 5) they argued that the alleged market for the open pound product was unproven despite the fact that open pounding is not a new concept and is currently authorized in Alaska, Canada, and California.

We have attached the 2015 proposed regulations and there are links to the hearing record<sup>1</sup> below and in the documents mentioned above. After the hearing was conducted, CFEC decided not to modify the administrative areas<sup>2</sup>, because there was very little public support to do so, and no new and approved management plan and rationale existed to help support the proposed change.

It should be noted that even if the BOF were to develop a management plan that allows pounds as alternative gear for herring seiners in Southeast, CFEC would have to determine whether such a proposal is consistent with the Limited Entry Act. Without adjudging the compelling comments made by fishermen at CFEC's 2015 public hearing, it stands to reason that the burden of persuasion with respect to this issue is very high.

Since there doesn't appear to be any new information, we do not believe that a meeting at this time would be fruitful. It might be best for you to work with the BOF and other interested parties to explore and develop a new concept prior to continuing the discussion.

Best regards,

Dale Kelley  
Commissioner

Fate Putman  
Chair

cc: Ryan Kapp <kappjr@comcast.net>  
Alan Otness <adotness@gmail.com>  
Joe Lindholm <redriverfisheries@comcast.net>

Attachments (3)

<sup>1</sup> CFEC Hearing Record, November 6, 2015.

<sup>2</sup> 20 AAC 05.230(a)(9)

A - Northern Southeast Area - Districts 9 - 16, as described in 5 AAC 33.200.

C - Southern Southeast Area - Districts 1 - 8 and Dixon Entrance District as described in 5 AAC 33.200.



February 10, 2020

Fate Putman, Chairman  
Dale Kelley, Commissioner  
Commercial Fisheries Entry Commission  
8800 Glacier Highway, Suite 109  
PO Box 110302  
Juneau, Alaska 99811-0302

Dear Chairman Putman and Commissioner Kelley

We have been proposing using Open Pound Roe on Kelp as an alternative to sac roe seining in Sitka Sound since publishing "Open Platform Spawn on Kelp" by Philip Mundy PhD, John Gissberg PhD and Samuel Sharr BS. in Dec. 1996. We have met with the Alaska Board of Fisheries (BOF) through the years and had various setbacks during those years with trying to implement our proposal. We completed a trial project in 1998 and 1999, working with the Alaska Dept of Fisheries (ADFG), showing the validity of open pound spawn on kelp in the Sitka sac roe area. ADFG published a study showing ample kelp in Southeast Alaska available for the project.

Our latest setback is an opinion by Seth Beausang, Assistant Attorney for the State of Alaska Department of Law (DOL), (Memorandum March 4, 2016) which states "The board does not have authority to allow new entrants into the Northern Southeast herring pound limited entry fishery by allowing non-permit holders to use open pounds in the fishery" Because of this opinion the BOF cannot act on our proposal due to the Northern Pound administrative area overlapping the Sitka seine area.

The BOF requested the Commercial Fisheries Entry Commission (CFEC) to exclude the Sitka area from the Northern Pound area. CFEC had a hearing about the BOF request and the outcome was no action. We were told the hearing was supposed to be about the overlap rational, when the overlap occurred, etc. But the record shows the hearing was about the BOF proposal and the markets of our future production. We contend the BOF should have been the administrator of the proposal not the CFEC. The CFEC did not meet its obligation to set the fisheries areas as the BOF wants.

As time passed, we have had exchanges with the CFEC trying to overcome the DOL opinion which has left the BOF unable to consider our proposal. An e-mail exchange on Feb 28, 2017 to Seth Beausang from Bruce Twomley states that if the BOF were to again request the Sitka area excluded from the Northern Pound area the CFEC may take up the issue again. The BOF issued another request in a second letter to CFEC on March 16, 2018.

Our group has contacted the CFEC, asking when and where the new hearing would take place. We received replies that the hearing would not go forward. The reply to Ryan Kapp, February 1, 2019 from the CFEC shows they are not going to act on the BOF request. The CFEC reply also shows they are under the opinion that if the BOF were to allow GO1A permittees the alternative use of open pounds to harvest Sitka herring it would be adding more users to the limited entry Northern pound area. (DOL 3/4/16) The CFEC e-mail, Feb. 1, 2019 suggests if the BOF were to allow seiners to have an alternative harvest method of open pound they would be "additional users into this limited entry fishery" meaning CFEC may consider the Sitka area herring stocks are now the Northern Pounders stock due to the overlapping areas.



**Did the overlap of the Northern Pound area with the Sitka seine area add to the potential of adding more users to the Sitka area herring stock? Indeed, DOL has stated the Northern Pound fishermen can propose to the BOF to allow them into the Sitka herring stock area because it is their area too. At the last BOF hearing cycle for Southeast Alaska finfish the proposal of allowing Northern Pounders into the Sitka overlap area was on the proposal list and, fortunately for Sitka permittees, was denied by the BOF.**

**The DOL opinion and the CFEC e-mail exchange, saying Northern Pound permittees have access to Sitka herring stocks, exemplifies the original administrative area of the Northern Pound permittees was too expansive. Never would the CFEC add more users into an already Limited Entry GO1A Sitka herring Stock. So, it must be as Bruce Twomley said in the hearing, "And so we had to acknowledge that our current definition of Northern spawn on kelp (area) may not have fully complied with our statute" He was speaking about the overlapping areas.**

**IF the CFEC fails to exclude Sitka from the Northern Pound area. The BOF, in the upcoming cycle, will likely be overrun with proposals because it's now assumed Northern Pounders have access to Sitka herring stocks. Herring stocks are regulated by spawning areas and Northern pound fisheries have never been on Sitka spawning stocks.**

**It concerns me the Board will not be able to deliberate our proposal in the 2021 cycle because of the overlapping administrative areas. The BOF has sent you a second letter requesting you to separate the areas but there has been no action put toward this request to date. April 10, 2020 is the deadline for submitting proposals to the BOF. Will the Board staff reject our proposal again because it cannot be acted on by the BOF according to DOL? This denial happened the last Board cycle and resulted in the second letter being sent to CFEC asking for the area overlap to be corrected so the BOF could hear, deliberate, and render decision on the proposal. If Sitka herring stocks are now considered to be Northern pound stocks then what happens to the Seine permit value if Northern pound permittees are allowed on Sitka Stocks? GO1A permits have typically been 10 times the value of Northern pound permits. Limited entry in Sitka happened first, Northern pound limited entry came years later. The overlap, unless corrected by CFEC, now suggests more users on the fully utilized Sitka stock.**

**CFEC should correct the definition of the Northern pound area into a "smaller administrative area" as Commissioner Carl Rosier suggested as a choice the CFEC could make when the area was adopted. We again request a meeting with CFEC Commissioners to discuss our concerns and plan a way forward. We suggest a meeting with CFEC at the soonest possible time so we may submit the proposal to the BOF prior to the deadline.**

Best regards, Darrell Kapp

A handwritten signature in black ink that reads "Darrell Kapp".



## Pacific Herring Information

- [Statewide Management](#)
- [History](#)
- [Species Information](#)
- [Herring Gear Types](#)

### Statewide Management

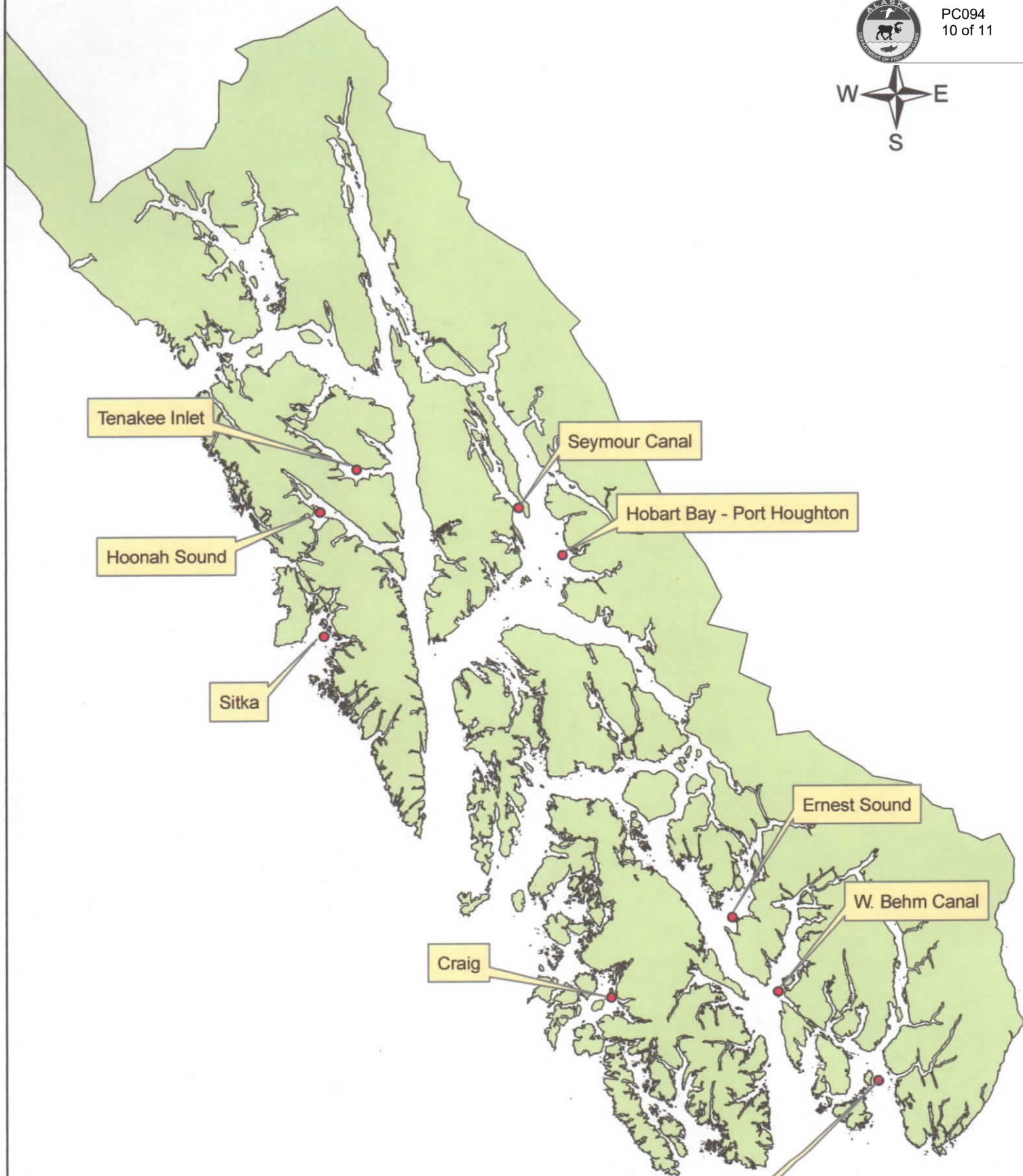
Harvest policies used for herring in Alaska set the maximum exploitation rate at 20% of the exploitable or mature biomass, consistent with other herring fisheries on the west coast of North America. The 20% exploitation rate is lower than commonly used biological reference points for species with similar life history characteristics (Funk 1991). In some areas, such as Southeast Alaska, a formal policy exists for reducing the exploitation rate as the biomass drops to low levels. In other areas, the exploitation rate is similarly reduced, without the formal policy. In addition to exploitation rate constraints, minimum threshold biomass levels are set for most Alaskan herring fisheries. If the spawning biomass is estimated to be below the threshold level, no commercial fishing is allowed. Threshold levels are generally set at 25% of the long-term average of unfished biomass (Funk and Rowell 1995).

Unlike most other Alaskan fisheries, fishery managers actively manage the sac roe fishery to obtain the highest-valued product possible. An intensive sampling program is used to monitor the condition of the ripening females, and fishery managers use this information to carefully time fishery openings down to days or even hours before the main spawning event.

Most herring fisheries in Alaska are regulated by management units or regulatory stocks (i.e., geographically distinct spawning aggregations defined by regulation). Those aggregations may occupy areas as small as several miles of beach or as large as all of Prince William Sound. Herring sac roe and spawn-on-kelp fisheries are always prosecuted on individual regulatory stocks. Management of food/bait herring fisheries can be more complicated because they are conducted in the late summer, fall, and winter when herring from several regulatory stocks may be mixed together on feeding grounds distant from the spawning areas. Where possible, the BOF avoids establishing bait fisheries that harvest herring from more than one spawning population. For historically-developed food/bait fisheries that harvest more than one regulatory stock, such as the Dutch Harbor or Kodiak fisheries, BOF regulations close the food/bait fishery if any of the component spawning populations are below threshold. Where there is more than one fishery on a spawning population, the BOF allocates specific percentages of the annual allowable harvest to each fishery.

For sac roe fisheries, openings are timed to occur when herring have produced the maximum amount of roe. The duration of openings is also set to achieve harvest quotas as closely as possible. Entry into most herring fisheries in Alaska has been limited under the authority of CFEC.

[Based on excerpts from the publication, Commercial Fisheries in Alaska, Woodby et al. Alaska Department of Fish and Game, Special Publication 05-09, June 2005 (PDF - 1,059K). Information or data on this web page may have been updated and may no longer match the original publication.]





# MEMORANDUM

## State of Alaska

### Department of Law

**TO:** Glenn Haight  
Executive Director  
Alaska Board of Fisheries

**DATE:** March 4, 2016

**FILE NO.:** JU2015200517

**FROM:** Seth M. Beausang *SMB*  
Assistant Attorney General

**TEL. NO.:** 269-5289

**SUBJECT:** Department of Law  
comments on proposals  
for the March 8-11, 2016  
Statewide Finfish and  
Supplemental Issues  
meeting

The Department of Law has the following comments on the proposals to be considered by the Board of Fisheries at its March 8-11, 2016 Statewide Finfish and Supplemental Issues meeting:

**Proposal 126:** As we explained to the board last cycle, this proposal would allow Southeastern Alaska herring purse seine permit holders in Sitka to use open herring pounds in Sitka Sound in lieu of their seine gear. The Northern Southeast herring pound fishery is a limited entry fishery and includes Sitka Sound within the limited entry administrative area. In Southeastern Alaska, a "herring pound" can include an "open pound," which is defined in 5 AAC 27.130(e)(2). The board does not have authority to allow new entrants into the Northern Southeast herring pound limited entry fishery by allowing non-permit holders to use open pounds in the fishery. We understand from PC 16 that CFEC considered changing the administrative area of this limited entry fishery, in order to allow the board to act on this proposal, but that CFEC ultimately declined to change the administrative area. The board does not have the authority to adopt this proposal.

**Proposal 194:** Based on the statements in the proposal about the alleged impacts of trawl fishing on subsistence uses in this area, the board is encouraged to consider



Submitted By  
Darren Patrick  
Submitted On  
12/20/2021 9:51:49 AM  
Affiliation  
  
Phone  
9077386904  
Email  
[gustavus65@gmail.com](mailto:gustavus65@gmail.com)  
Address  
PO Box 226  
Gustavus, Alaska 99826

I support both (p80)&(p83)&(p144). I have been fishing SEAK for 30 years and have seen many cuts to many fisheries. It has made it much more difficult to produce high quality fish and maintenance the vessel. The charter fleet does not help any fisheries financially period. They also do not follow the rules of the road on the ocean. They are always anchored on the drag in the middle of the troll fleet. They have access to the beach drags inside the 1 mile line where the heaviest concentration of fish are. What is good for the goose is good for gander. We all need to follow guildlines and contribute funds to help protect and conserve these fisheries for many generations. □□□



Submitted By  
David Creighton  
Submitted On  
12/22/2021 10:09:28 AM  
Affiliation

Phone  
907-401-0686  
Email  
[Davecreighton@gmail.com](mailto:Davecreighton@gmail.com)  
Address  
Po Box 217  
Criag, Alaska 99921

I am David Creighton. I am a born and raised Alaskan and currently reside year around in Craig. In these comments I represent myself and our family-owned business Shelter Cove Lodge in Craig, AK. Shelter Cove operates an 8-boat fleet in the city of Craig. On average we employ 5 people year around and 32 during our primary operating season of June through August. Many of our seasonal employees are college students returning home for summer to make the money needed to return to school the following year.

Our business brings between 500 and 600 people into Craig each summer. They purchase round trip tickets on our local air carrier, gifts, alcohol, they pay a 5% sales tax on their trip and purchases as well as a local bed tax. Our business distributes money throughout the year to Craig's local stores for tackle, fuel, equipment, services, and supplies. Our local boat shop owner expressed to me today that the charter industry accounts for close to 50% of his gross annual revenue and without the charter fleet, it would no longer pencil out for him to operate in Craig.

I believe many Alaskans are keenly aware that depending on resource-based economics through mass extraction has proven to be a dying approach. It is successful in the short term but eventually the resource will be depleted. With this thought in mind, I urge you to consider the economic benefit per pound of resource extracted when you compare the tourist-based charter fishing industry to other resource consumers/harvesters.

#### Proposition 82

I am strongly opposed to Proposition 82 as written. With a regulation set that allows for a 1 daily/ 1 annual fish for a non-resident after June 15, our clients will not be willing to pay for a fishing trip. A 1 or 2 king annual limit is not sufficient to sustain a lodge business that operates a 3-day package and people will not spend the travel dollars to fish for 1 or 2 days. We will be forced to reduce our season to a start date of approximately July 15th when the silvers traditionally arrive in catchable/marketable numbers. Our lodge cannot survive off of a six-week season.

The charter fleet has been continually hit with retention reductions to allowable catch for the last 15 years. We are now rapidly approaching the breaking point and the destruction of one of our small communities' last remaining economic sustaining industries. Please comprehend that a person visiting Alaska to fish after June 15th for 3 days will only be able to retain a total of 5 primary game fish. Don't forget that 4 of those 5 fish are regulated so they can only retain small ones. Would you spend more than \$5000/person total including travel to accomplish this?

#### Proposition 83

I am in support of Proposition 83. I feel whole heartedly SEAGO has drafted a well-researched proposal sufficient to request this equitable solution for both gear groups. SEAGO has examined and demonstrated via historical data and supporting numbers derived with ADF&G assistance that prove Prop. 83 will pencil out. 83 will sustain the charter industry, impart very little impact on the troll fleet all while still accomplishing the necessary management of the species and compliance with the treaty.

#### Proposals 84,85, and 86

When it comes to king salmon, a resident priority seems unnecessary. So far in history, I can only recall kings being shut down to residents late in the season. By this time, residents have had ample opportunity to catch their kings. By the time the closures occur, most have moved on to collecting silvers and bottom fish. One of the distinct advantages of being a resident is you get to target each species when the opportunity is best. You fish with the fishing is good! King salmon fishing is not typically considered to be at its peak in August.



Submitted By  
David Egan  
Submitted On  
12/3/2021 7:47:09 PM  
Affiliation



PC097  
1 of 1

I support proposals 156, 157, 158 and oppose proposals 159, 160, 161, 163, 164, and 165. Subsistence fisheries have sustained Alaskans for thousands of years longer than the commercial fisheries and now they're under threat. We owe Alaska's natural abundance to the stewardship of Alaska Native people and it's important to give their voices priority in matters concerning the management of natural resources. The herring stock is endangered and needs to be restored to greater abundance before we risk diminishing it further.



Submitted By  
David Ellsworth Johnson  
Submitted On  
12/22/2021 9:56:55 PM  
Affiliation

Phone  
9076176644

Email  
[dejohnsonak@yahoo.com](mailto:dejohnsonak@yahoo.com)

Address  
137 Shelikof Way  
Sitka, Alaska 99835

As a long-time Alaskan resident and sport fisherman with a daughter who is a commercial troller I am concerned that the charter sport fishing fleet continues to grow in volume and catch. The commercial trollers financially support hatcheries; the charter fleet does not.

I support efforts to safeguard the commercial troller's allocation of king salmon, particularly in years of lower abundance. Rather than resort to in-season changes on sport fishing bag limits I support careful and conservative bag limits that safeguard resident angler's opportunities to take and keep king salmon. I support aggressive study and data gathering to document charter fisherman impact on threatened fish stocks transiting Icy Straits and Sumner Strait.

Overall I am very proud of the outstanding job of managing our treasured fisheries that the department and the advisory committees have worked together over the years, and I commend you all for your hard work.



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 Clam Gulch / Ninilchik, Alaska. A strong sustainable hatchery fishery in Southeast and statewide benefits all users by supplementing salmon for commercial, sport, subsistence, jobs, commerce and processor opportunities.

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,

David Martin  
dmartin4091@gmail.com  
(907) 252-2752

Submitted By  
David Barnaby O'Rorke  
Submitted On  
12/22/2021 1:49:03 PM  
Affiliation



PC100  
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.