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**ALASKA BOARD OF FISHERIES**  
**Statewide Finfish Meeting**  
Anchorage | March 10-14, 2023

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**Submitted by:** Ronald Abbott

**Community of Residence:** Palmer, AK

**Comment:** These salmon belong to all Alaska residents not a select few many whom are from out of state. The duty of representatives of the people is to protect the residents , not the parties who promise them the largest payouts.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Steven Adkin

**Community of Residence:** Anchorage, AK

**Comment:** I dip net by mouth of Kenai.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

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<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



Dear Chair Carlson-Van Dort and Alaska Board of Fisheries Members:

The Alaska Fisheries Development Foundation (AFDF), on behalf of the undersigned fishermen and processors participating in Alaska's Pacific cod fisheries, is submitting the attached proposal as a substitute for proposal #161, which was first submitted during the October 2022 Pacific cod meeting<sup>1</sup>. The need, intent, and effect of the proposal has not changed since original submission, but the attached revision includes improved language after public input. We thank you for the opportunity to comment in strong support of this revised proposal - Policy on Groundfish Fishery Resources Management.

This proposal is necessary to retain sustainability certification for Alaska's state waters Pacific cod fisheries by both the Responsible Fisheries Management (RFM) and Marine Stewardship Council (MSC) programs. These types of certification programs assure buyers, retailers, and general consumers that the fishery conforms to internationally recognized standards for environmental sustainability. Alaska needs RFM and MSC certification to sell cod into nearly all markets in the U.S. and European Union, among others. This proposal was put forward in response to the RFM and MSC certifications carrying a 'condition' related to the lack of written fishery-specific management objectives for Pacific cod harvested in Alaska state waters. AFDF is the client for these certifications. A condition means that the certification bodies are granting the client time to address the issue before the next certification cycle. If it is not addressed, these fisheries will lose sustainability certification and access to the most valuable markets for Alaska cod.

As the client responsible for fulfilling any conditions, AFDF facilitated discussions among a steering committee that represented a broad group of Pacific cod stakeholders to draft a BOF proposal to meet the condition for the certification. The attached proposal is non-allocative, benefits all gear groups, and is supported by stakeholders as a whole. It outlines a very broad management policy for the BOF, similar to policies for other species such as crab and salmon. The proposal does not change current BOF management. It only serves to document the broad goals and objectives that the BOF already uses to guide groundfish management so that Alaska can "get credit" for the management the BOF already does and satisfies this technical requirement to retain certification.

Serious impacts would result from the Alaska cod industry losing certification. Loss of certification means lower value received for Alaska's Pacific cod harvests. It would also create confusion in the marketplace for all Alaska cod due to the continued certification of cod harvested in federal waters but not in state waters, as well as damage the overall Alaska seafood brand. There would also be significant increased handling and logistics costs because cod from state waters would need to be accounted for, processed, and marketed separately from cod harvested in federal waters. Many Alaska fishermen and processors participate in both federal and state waters cod fisheries, and our harvests collectively share an important marketplace.

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<sup>1</sup> This proposal also mirrors RC8, submitted during the October 2022 Pacific cod meeting, which was the result of public review and input.



Alaska Department of Fish and Game (ADF&G) supports maximizing the value from Alaska's fisheries, with one of the stated primary goals of the department being to optimize economic benefits from fish and wildlife resources. Cod is economically important to every gear group (jig, pot, longline, trawl) and all regions (Bering Sea, Aleutian Islands, Western Gulf of Alaska, Central Gulf, and Eastern Gulf), consistently making up 10% or more of the ex-vessel value of all species in Alaska. The state waters cod Guideline Harvest Levels combined exceeded 71 million pounds in 2022. However, as previously stated, with the loss of certification all cod caught off Alaska in state and federal waters would be affected; in 2021, that was more than 156 million pounds, with a first wholesale value of \$283 million.

While the conditions first placed on cod were the impetus for this proposal, it is submitted as a statewide proposal for all Alaska groundfish fisheries, to be considered at the board's March 2023 meeting. Given a similar situation for the certification of the Prince William Sound pollock fishery, the move to include all such fisheries statewide was made to proactively address any other potential certification of a groundfish fishery in state waters. Adopting this proposal will allow Alaska to continue to be included in the highest value cod markets and receive maximum economic benefit from these important fisheries. Managing fisheries sustainably for generations is the primary responsibility of the BOF and ADF&G. But we must also be able to maintain and expand markets to sell those fish to have a fishery. We respectfully request that the BOF adopt the attached proposal and establish a broad, written policy for groundfish management that aligns with the BOF's current practices. With this action, the Alaska state waters cod fishery and other groundfish fisheries will continue to meet the requirements for RFM and MSC certifications, and Alaska will get marketplace credit for the exemplary fisheries management practices already in place.

Thank you for your consideration and service.

Sincerely,

Jason Anderson, Alaska Seafood Cooperative  
Julie Bonney, Alaska Groundfish Databank  
Julie Decker, Alaska Fisheries Development Foundation  
Angel Drobnica, Western Alaska Community Development Association  
Abby Fredrick, Silver Bay Seafoods  
Hannah Heimbuch, Under 60 Cod Harvesters  
Darius Kasprzak, Alaska Jig Association  
Nicole Kimball, Pacific Seafood Processors Association  
Stephanie Madsen, At-Sea Processors Association  
Malcolm Milne, North Pacific Fisheries Association  
Shannon Carroll, Trident Seafoods  
Chad See, Freezer Longline Coalition  
Rebecca Skinner, Alaska Whitefish Trawlers Association





## **PROPOSAL XXX – POLICY ON GROUNDFISH FISHERY RESOURCES MANAGEMENT.**

Create and establish Alaska Board of Fisheries policy regarding the management of groundfish fishery resources in State of Alaska waters, as follows:

### **GOAL AND BENEFITS**

It is the goal of the Alaska Board of Fisheries and the Alaska Department of Fish and Game to manage groundfish stocks in accordance with the Sustained Yield (Article 8, section 4) and the Common Use (Article 8, section 3) directives of the Constitution of the State of Alaska. Management of the groundfish resources in accordance with Alaska’s constitution is expected to protect, maintain and improve the resource.

Management of these fisheries for the purpose of achieving this goal will result in a variety of benefits which include but are not limited to:

- (1) Maintaining healthy stocks of groundfish to ensure their continued reproductive viability and the maintenance of their role in the ecosystem;
- (2) Providing a sustained supply of high-quality product to consumers, and;
- (3) Providing opportunities for commercial, sport, subsistence, and personal use fisheries.

### **OBJECTIVES**

To achieve the management goals above and provide the benefits available from these resources, it is necessary to set objectives which will protect stocks and provide for sustained utilization of these resources. With regards to the management of groundfish fishery resources in State of Alaska waters, the Alaska Board of Fisheries has the following objectives:

1. Minimize adverse interactions with other stocks and fisheries.
2. Protect habitat from unsustainable fishing practices.
3. Utilize management measures that ensure adherence to annual and seasonal catch limits.
4. Harvest the resource to optimize quality and value of product.
5. Harvest the resource with consideration of ecosystem interactions.
6. Coordinate with federal management agencies responsible for groundfish fishery management.
7. Manage fisheries based upon the best available information.
8. Manage fisheries consistent with conservation and sustained yield of healthy groundfish resources.
9. Maintain commercial, sport, subsistence and personal use opportunities.

\*\*\*\*\*

**What is the issue you would like the board to address and why?**

At its March 23, 2013 meeting, the board repealed 5 AAC 28.089. GUIDING PRINCIPLES FOR GROUNDFISH FISHERY REGULATIONS, citing an interest in removing duplicative and unnecessary regulatory wording pertaining to the State’s management of its groundfish fisheries. However, we believe that the board did



not fully recognize the value that this regulation had in documenting sound and precautionary conservation management practices for the public's consideration.

The Board has a history of adopting policies in other fisheries which are intended to give guidance to future Boards, department staff, and the public (i.e., policies for the management of sustainable salmon stocks, King and Tanner crab, mixed stock fisheries, and statewide escapement goals). The Board and public will benefit from an overall groundfish policy that provides guidance in decision-making during consideration of future proposals. Formalizing this policy for groundfish is consistent with the State's approach in managing the health and sustainability of other Alaska's fisheries and will help document Alaska's record as a leader of fisheries conservation and responsible management.

**PROPOSED BY:**

Alaska Fisheries Development Foundation

PO Box 2223, Wrangell, AK 99929

Ph: 907-276-7315

[jdecker@afdf.org](mailto:jdecker@afdf.org)

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 161: Support With Amendments



# Alaska Longline FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 / 907.747.3400 / [alfastaff@gmail.com](mailto:alfastaff@gmail.com)

Alaska Board of Fisheries  
Re: Statewide proposals

February 26, 2023

Dear Chair Carlson-Van Dort and Board of Fisheries members,

I am submitting these comments on behalf of the Alaska Longline Fishermen's Association (ALFA) on Statewide Board of Fisheries Proposals **161, 163, 164 and 165**.

The Alaska Longline Fishermen's Association (ALFA) is a Sitka-based organization of over 200 independent commercial vessel owners and crewmembers who are committed to the sustainable harvest of sablefish, halibut, groundfish, and salmon while supporting healthy marine ecosystems and strong coastal communities .

**ALFA supports proposal 161. We also support the amendments proposed by the Kodiak AC.**

This proposal will provide guidance for the board and public on factors considered by the board when deliberating changes to groundfish regulations in Alaska waters, which will improve transparency in the management process. ALFA recognizes the value in providing this guidance. That said, we find the changes recommended by the Kodiak AC (RC008) to improve clarity and impact. These changes are included (with strike out and underline) below:

**Substitute language in the bullets numbered 1, 2, and 3 with:**

- 1) reserving groundfish stocks that occur in their natural state to the people for common use;
- 2) providing opportunities for commercial, sport, subsistence, and personal use;
- 3) maintaining healthy stocks of groundfish to ensure their continued ~~reproductive~~ viability throughout their life stages and maintenance of their role in the ecosystem; and
- 4) providing a level of harvest that maintains a sufficient biomass to ensure continued sustainability."

**ALFA supports proposals 163 and 165.**

These two proposals prohibit the use of guide services in accessing personal use (163) and subsistence (165) fisheries. Because guiding introduces a profit motive to the harvest of personal use and subsistence resources, ALFA believes the proposals address a fundamental conflict and growing concern.

The subsistence and personal use fisheries are unique in that they are exclusively reserved for Alaska residents. They provide Alaskans with the chance to personally harvest state resources with fishing gear that is more efficient than rod-and-reel without directly competing with financially driven interests. Because personal use and subsistence fish cannot be sold, Alaskans' limit their subsistence and personal use harvest to the amount they or their families can enjoy and consume. In other words—harvest is limited by consumption without a profit motive. In contrast, the guide industry is profit driven and financially motivated to lure an ever-increasing number of clients onto their boats—that is the nature of



their business. The use of guides in the personal use fisheries is increasing the number of personal use fishermen, increasing competition for limited resources, and poses a particular risk to the priority that has traditionally been granted to personal use fisheries.

Unlike subsistence, personal use fisheries do not have a constitutionally guaranteed priority. Nevertheless, personal use fisheries are often awarded a status similar to subsistence fisheries because past Boards have assumed the impacts of these fisheries would be limited. As guides increasingly recognize the profit associated with providing personal use or subsistence services, the number of participants and hence the impact of the fisheries can be expected to grow. Since most of Alaska's finfish resources are fully allocated, increased personal use harvest will increase conflicts with other sectors. Furthermore, the impacts on Alaska's limited resources may convince future Boards to change the status of personal use fisheries, which will disadvantage those who have historically depended on personal use.

Adoption of proposal 165 is particularly important. Subsistence fishing is by a definition customary and traditional activity. There is no custom or tradition of hiring a guide to subsistence fish. Introducing the guiding profit motive to the constitutional priority of subsistence access has the potential to fundamentally change resource use in Alaska to the detriment of all residents. ALFA urges the Board to support both proposals 163 and 165.

**ALFA supports proposals 164.**

If proposal 163 is not approved by the Board, ALFA supports establishing the registration and reporting requirements for personal use guides and transporters authorized by proposal 164. These requirements would provide a future Board with additional information on the use of guide services to access subsistence resources and the impact of that use on Alaska's fisheries. That data will be critical to future decision making should the Board not take action at this meeting to prohibit the use of guides in the personal use fishery.

Thank you for the opportunity to comment and for your work as a member of Alaska's Board of Fisheries.

Sincerely,

Linda Behnken  
(Executive Director, ALFA)

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 161: Oppose  
Proposal 163: Support  
Proposal 164: Support  
Proposal 165: Support



**Submitted by:** Alaska Outdoor Council

**Community of Residence:** Palmer

**Comment:** The Alaska Outdoor Council (AOC) recommendations to The Alaska Board of Fisheries members on Statewide Finfish proposals 163 -167.

After deliberations on these proposals regarding guided fish opportunities for Alaskan residents only AOC suggests that the board consider asking the AK Legislature to amend AS 16.05.251(e) to delete the word “sport” after guided.

Support adoption of proposal 164 with amendments.

5 AAC 39.205, 5 AAC 75.017, and 5 AAC 77.007 should be amended to separate out guided from commercially harvested fisheries.

Knowing the economical value of a commercial operation that provides Alaskans an opportunity to harvest their own fish would be beneficial when the board is making allocating fishery resources AS 16.05.251(e)

Proposal 163. Do Not Adopt.

Refer to AOC comment on Proposal 164, Fish Guides providing a commercial service to Alaskans catching their own fish as part of their “food security” are essential to many Alaskans. If for no reason other than public safety, that would be enough.

Proposal 165. Do Not Adopt.

Refer to AOC comments on proposals 163 and 164.

Proposal 166. Do Not Adopt.

AOC sees no biological concern being raised with allowing serious Dipnetter folks from participating in as many fisheries as possible.

Proposal 167. Do Not Adopt.

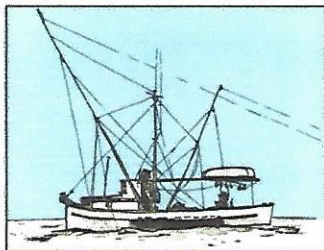
AOC sees no biological concerns being raised by fish managers with the current level of harvest reporting for personal use and subsistence salmon being harvested.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 11:**  
**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
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**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Support With Amendments  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



## Alaska Trollers Association

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

February 23, 2023

Chair Carlson-Van Dort  
Alaska Board of Fisheries  
c/o Board Support Section  
Juneau, AK 99811

Dear Chair Carlson Van-Dort and Board of Fisheries,

With over 450 members, Alaska Trollers Association (ATA) represents over 1500 permit holders. We are small independent fishermen who are integral to all Southeast Alaska community economies and our 100-year-old fishery makes up Alaska's second largest fishing fleet in our State. Trolling is an ocean fishery created to harvest salmon in its prime condition, individually by hook and line, so we deliver the world's highest quality wild salmon. ATA has the following comments on some of your pending proposals.

**We oppose Proposal 159** – *Close commercial fishing for a given species with one-fourth of a mile of any area closed to sport fishing.* ADFG managers coordinate internally for balance within the mixed stock fisheries regime.

**We oppose Proposal 160** – *Require surrender of proceeds gained from sale of wild king salmon caught in hatchery terminal harvest areas...* We oppose this proposal for the same reasons as we oppose proposal 159. ADF&G managers are able to make the best decisions in real time. Commercial fishermen should not be penalized for their catches when following management directives.

**We support Proposal 163** – *Prohibit guiding in personal use finfish fisheries, as follows...* The Subsistence fishery and its stepsibling the Personal Use fishery are unique in that they are exclusively reserved for Alaskan residents. They provide those of us who want to participate with the chance to personally harvest the state's bounty with fishing gear that is more efficient than rod-and-reel and without directly competing with financially-driven interests.

**We support Proposal 164** – *Establish registration and reporting requirements for personal use guides and transporters, as follows...* More information on all guides and transporters should always be obtained as Alaska's fishery resources are already fully allocated among user groups. While ATA does not support commercial guide operations in personal use fisheries, we generally always support more user data.



We support Proposal 165 – *Prohibit compensation for guide services in subsistence fisheries, as follows...*  
Guided sport involvement with subsistence fishing and runs counter to the “customary and traditional” means of resident harvest. In 2021, the Board of Fisheries adopted a regional proposal to stop the guiding of subsistence fishermen in the PWS fishery. The BoF should now apply the same approach to all subsistence fisheries in the State.

Alaska Trollers Association (ATA) is appreciative of the opportunity to address these proposals and thanks you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy Daugherty", written in a cursive style.

Amy Daugherty  
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 163: Support  
Proposal 164: Support  
Proposal 165: Support





**Submitted by:** Robert Albaugh

**Community of Residence:** North Pole, Alaska

**Comment:** I go with family members, to supplement our food supply

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 11:**  
**Proposal 12:**  
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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Landon Alberston

**Community of Residence:** Palmer, Alaska

**Comment:** I strongly oppose Proposals 163-167 and ask the Board of a Fisheries to VOTE NO on each of them.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my



harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC9**

**Submitted by:** Ben Allen

**Community of Residence:** Wasilla, Alaska

**Comment:** These proposals would prohibit guided hooligan dip netting on the Susitna river. Hooligan are a very abundant species that have sustained high levels of harvest over the last several years. Hooligan are a very important subsistence fish for south central Alaskans. Guiding allows residents to enjoy the bounty of these hooligan.

Prime hooligan spots along with most of the fishery is only accessible by boat. These proposals are discriminatory to users of the Susitna river, who depend on a guide to harvest fish in this fishery. These proposals would deny Alaskans without a boat the opportunity to harvest these fish in the Susitna drainage.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b> Oppose	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b> Oppose	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b> Oppose	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b> Oppose	<b>Proposal 159:</b> Oppose	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b> Oppose	<b>Proposal 160:</b> Oppose	<b>Proposal 168:</b>
<b>Proposal 153:</b> Oppose	<b>Proposal 161:</b> Oppose	<b>Proposal 169:</b>
<b>Proposal 154:</b> Oppose	<b>Proposal 162:</b> Oppose	
<b>Proposal 155:</b> Oppose	<b>Proposal 163:</b> Oppose	



**PC10**

**Submitted by:** Brendon Allen

**Community of Residence:** Anchorage, AK

**Comment:** I fish to get the nutrients my body needs through out the year. Eating off the land is the best way to get the sustenance needed to survive. I fish the Chitina River with Ryan Ford.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Barbara Allen



**PC11**

**Community of Residence:** Chugiak, AK

**Comment:** I have been Dipnetting for about twenty years, to obtain some salmon for my use. Some I can, some I freeze. I dipnetted in Chitna for a number of years then switched to Dipnetting on the Kenai about 10 years ago. I dipnetted off the beach for three years, however, after almost losing a truck and fighting the surf, I quit that. I came across The Dip Ship and have been Dipnetting with Glenn Trombley and his son for 7 years now. I love the Kenai and the town of Kenai. It is always a nice get away from the Anchorage area. I would like to continue Dipnetting off a boat, as I am getting older and this is much safer.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
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Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC12**

**Submitted by:** Scott Allen

**Community of Residence:** Anchorage, AK

**Comment:** I fish for food with friends and family. I fish for a good way to relax and unwind, helps center my chi... my wife and I plan on moving to Kenai as soon as I can retire!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:

Proposal 13:  
Proposal 82:

Proposal 87:  
Proposal 153:

**Proposal 154:**  
**Proposal 155:**  
**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**

**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose  
**Proposal 164:** Oppose  
**Proposal 165:** Oppose

**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



Honorable Chair and Board of Fish members,

Re: Proposal 157, 5 AAC 39.115 Designation of Salmon Net Registrations Areas

**STRONGLY SUPPORT**

It is my understanding that a person who is a commercial fisherman in Alaska cannot own and operate Salmon net permits in more than one area in Alaska.

I believe this proposal will allow this to be legal by the deleting 5 AAC 39.115.

When a family is supported exclusively by commercial fishing it is becoming more difficult to support one's family by fishing only one area. Fishing families need to diversify. It is understandable that they would look to other areas to find potential opportunities to support themselves. By passing this proposal a fisherman would be able to fish two different salmon fisheries in one year by using two different boats that are exclusively registered in one separate salmon net area.

To allow a family to own and operate more than one Salmon net permit in separate areas makes total common sense.

Respectfully,

Theresa Allen-Olson  
3009 Halibut Pt. Rd.  
Sitka, AK 99835  
907-738-2947

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Proposal 157: Support



**Submitted by:** Phillip Almeda

**Community of Residence:** Anchorage alaska

**Comment:** I am a transplant Alaska Resident since 1993. And I support not letting the the federal government take over our (Alaska) fisheries. On top of that, I do not support a few commercial fishermen trying to ban or limit my personal use fishing opportunities. If the board and commercial fishermen who are trying to limit my access had to follow the same restrictions they are trying to impose, they wouldn't be trying to impose the restrictions. The fisheries are for all Alaskan residents not for commercial fishermen only.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Howard Amos

**Community of Residence:** Anchorage. Alaska 99518

**Comment:** Howard Amos, lifelong fisher, Fish to feed my family, fished on Nunivak Island, now at Kenai Peninsula, my entire family participates on these fishing ventures

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**PC16**

**Submitted by:** Dale Anderson

**Community of Residence:** Copper Center, AK

**Comment:** I've been an Alaskan for the past 40 years and have lived on both Army Bases, Anchorage, Fairbanks and now reside in Kenny Lake, AK (Copper Center Mailing address). Moved out to Kenny Lake in 2008 and became part of the volunteer FD and EMS squad. Being on those two departments I know how dangerous the copper river is to the many Alaskans that use the area for recreation.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I would hope that the Board of Fisheries would listen more to the personal use residents who fill their freezers with fresh caught, safely harvested salmon, who are using these charters more than the big corporations and fishing fleets who would rather "strip mine" our resources and get as much as they can now and not worry about tomorrow. Please do not make the same mistake that you did with the halibut limits you imposed on personal use but no limits on the commercial fleet. I would hope you work for Alaskans and not just strip fleets.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 155:**

**Proposal 156:**

**Proposal 157:**

**Proposal 158:**

**Proposal 159:**

**Proposal 160:**

**Proposal 161:**

**Proposal 162:**

**Proposal 163:** Oppose

**Proposal 164:** Oppose

**Proposal 165:** Oppose

**Proposal 166:** Oppose

**Proposal 167:** Oppose

**Proposal 168:**

**Proposal 169:**



November 7, 2012



PC17  
1 of 2



Dear Members of the Board,

RE: Comments regarding Proposal 11,12,13,31 & 32

I am writing to provide testimony to the Board of Fish (BOF), regarding the following Bristol Bay Finfish proposals #'s 11, 12, 13, 31, & 32.

My name is Kent Anderson. I am the owner of Anderson's Outdoors-Alaska Salmon Camp, a small guided sport fishing camp on the lower Nushagak River. I have been operating the camp since 2004 and guiding anglers in Alaska since 1995. I hold a Chogguing Land Use Permit for my operation. I also have a degree in Fish Biology and was previously employed by a state Fish and Wildlife agency. I have great respect for the Alaska Dept of Fish and Game (ADFG) in the management of the fish and game resources in Alaska. Other states should pay attention and implement some of the management tools used in Alaska.

**Proposal 11** – Regarding changes to the Nushagak Mulchatna King Salmon Management Plan.

#3 - I strongly support, the implementation of an ADFG “test fishery” to determine king:sockeye abundance prior to “openers”. This is especially important prior to June 28<sup>th</sup> as ADFG sonar data indicates a significant portion of the king run is entering or passing thru the Nushagak District netting area prior to this date. Also, years with a delayed migration into the river, due to environmental factors (cold water, low water, temperature, etc), many king salmon are impacted unintentionally (harvested or drop out mortality) as by-catch during the early sockeye openers. By performing the “test netting”, with a June 28<sup>th</sup> date or until adequate numbers of early returning king salmon have entered the Nushagak, this will ensure sustainable runs in the future, maintain genetic diversity throughout the entire run of kings, and still allow for the harvest of surplus sockeye later in the run.

#4 – using the “trigger” of 100,000 sockeye into the Wood River is useless. Everyone knows that 100,000 sockeye can enter on a single tide

#6 – If sport fishing harvest restrictions are implanted, there should also be mandatory restrictions placed on the commercial (Proposal 13) and subsistence users (see #8 below). If ADFG is serious about conservation of king salmon this must be done. Overall annual harvest by sport anglers is lower then either commercial (bycatch) or subsistence. (I don't have the exact reports to cite but I have read a number of ADFG annual reports that support this claim)

#8 - I strongly support limiting the number of days per week and gear (set nets only vs drift nets) used by subsistence anglers. Also, implementation of an annual king salmon limit by subsistence users (ex: 10/per year and they must be recorded similar to sport angler requirements)



**Proposal 12** - I support this proposal. While I feel that the smaller mesh (4.75") will also "tooth entangle" kings this may allow a few more kings to survive while still harvesting surplus sockeye. In addition, significantly reducing the number of openers or the duration prior to June 28<sup>th</sup> will allow a significant number of additional king salmon to enter the Nushagak.

**Proposal 13** – I strongly support a "fixed time" strategy as opposed to the current trend in allowing for almost unlimited openers. Setting "openers" that are only not fishing during the middle of the outgoing tide, as has been done for many years, does nothing to allow any species of salmon to enter the river.

**Proposals 31 & 32** - These proposals seem to be identical as written. I would support and gladly participate in reporting all king salmon caught during my operating season. I feel this would very quickly provided the needed data to the ADFG managers. However, it seems this would be almost impossible to enforce honesty in reporting by all user groups

The bottom line to all the Proposals is that more king salmon NEED to be allowed to enter the river. We as a sport angling group do not impact the overall run. Allowing more kings in the river will result in more kings spawning and sustaining the runs. King salmon are in a decline throughout their range due to many factors (habitat, water quality, dams, hatcheries, overfishing, etc). In the Bristol Bay Region, most of those factors are not present and the only the overfishing by some user groups has an impact. In the name of "Salmon Conservation", please do not allow one of the few remaining king salmon strongholds to be destroyed.

As stated above, my business relies on the opportunity to take visitors to Alaska on a fishing trip that meets or exceeds their expectations. These visitors bring millions of dollars annually to the State of Alaska. Most of which stays in Alaska. In years past, with low escapement numbers, those of us in-river sport fish groups have bore the burden of conservation. I feel strong that this should be an equitable share of responsibility within all user groups. Conservation of the resource will benefit all in the long term.

Kent Anderson  
Owner/operator  
Alaska Salmon Camp, Inc  
dba: Anderson's Outdoors-Alaska Salmon Camp

Contact Info  
Email : [salmoncamp@me.com](mailto:salmoncamp@me.com)  
Cell: 503-550-6303

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 11: Support With Amendments  
Proposal 12: Support  
Proposal 13: Support



**Submitted by:** James Atti

**Community of Residence:** Eagle River

**Comment:** I live in Eagle River, Alaska with my wife and two daughters. I took my family along with two older sons and daughter to Kenai, Seward, and Kasiloff over the years, mainly to harvest red salmon to smoke, and for food over the year. Fishing provides time to get away from work and time to camp and enjoy company.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Karissa Aubut

**Community of Residence:** wasilla, ak

**Comment:** We fish to help feed our children due to the rising cost of groceries. Please do not take this right away from starving families.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Gerald Babcock



**PC20**

**Community of Residence:** Nenana, AK

**Comment:** I am a single father, a retired Air Force Chief, and a 100% disabled veteran. I use the personal use fisheries to feed me and my son. I teach him responsible harvest and use of the entire fish, and this makes up over half of our annual meat diet. We primarily use the Chitina fishery, but we plan to go to the Kenai fishery this upcoming year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**PC21**

**Submitted by:** Tommie Baker

**Community of Residence:** Anchorage

**Comment:** Personal use fishing substantially cuts down on the time necessary for me to salmon fish. As a 61 year-old disabled veteran, I still work full time. Dip netting makes it much easier to feed my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Greg Balvanz

**Community of Residence:** Fairbanks, AK

**Comment:** I'm a 25 year veteran with a 100% combat related permanent disability rating. I've dipnetted for the last 10 years and every bit of what I catch is used. Besides eating the meat, I use the rest of every fish to season my garden with nutrients. From that garden comes many vegetables that my family enjoys. I use a chitna charter every year for the harvest and would be unable to enjoy the natural bounty provided to me as an Alaskan.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Ted Baran

**Community of Residence:** Anchorage, AK

**Comment:** I'm a 30 plus year Alaskan who loves to fish all over this great state.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC24**

**Submitted by:** Michael Barnes

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC25**

**Submitted by:** Steven Bartunek

**Community of Residence:** Soldotna, AK

**Comment:** I fish for food. Salmon in the Kenia river from the bank and my boat, Halibut and Cod out of Homer with Charter boats. I fish by the rules and take only what I know we'll eat for the year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC26**

**Submitted by:** Ross Baxter

**Community of Residence:** Soldotna Alaska



**Comment:** I've lived on the Kenai Peninsula for 20 years, one of the joys about living here is the FREEDOM to fill my freezer for winter time by dip-netting. It's a fun activity shared with my brother and other friends on occasion, mostly it's been a time when the family gets together. We all love Salmon and pray it stays an Alaskan tradition.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Derek Baxter

**Community of Residence:** North Pole AK

**Comment:** My family and I fish to help offset the cost of protein and groceries in Alaska. Our dipnetting allows us to plan for at least 2 meals a week off our catches.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.



**PC27**

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Ross Beal



**PC28**

**Community of Residence:** Fairbanks

**Comment:** I have very much enjoyed my opportunity to fly fish the Klutina River at Copper Center and hope to continue for many years. The impact that sport fishermen have is minute compared to commercial fishing. I am definitely against any restrictions that would have an impact or restrict my opportunity to enjoy this experience and our great sockeye fishing.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC29**

**Submitted by:** Janna Beasley

**Community of Residence:** Anchorage

**Comment:** I am a life long Alaskan. I fish to provide food for my family. I fish on the Kenai, in Seward & in Homer. Typically go with friends and family. On boats or off the shore.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC30**

**Submitted by:** Sam Beaty

**Community of Residence:** Kadilof

**Comment:** I have fished the Kasilof personal use fisheries for the last 24 years and fisheries a Alaska waters for the last 59 years. Every year the times are getting cut back. Last year for the 10 day set net opening we were only able to fish four days that the tides were fish able. The minimal impact we have on kings is not a major concern.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Mary Bell

**Community of Residence:** SOLDOTNA

**Comment:** Please do not restrict the dip netting. I have a family and the cost of food has sky rocketed so high the past year. I was born in Alaska and have lived on the Peninsula for 40 years and I have eaten fish all my life. Dip netting is important for my families survival. Thank you. Mary Bell

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.



**PC31**

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



**PC32**

**Submitted by:** Martin Bellerive

**Community of Residence:** Anchorage, Alaska

**Comment:** As an aging retired Vet on a fixed income, the Personal Use fisheries provide an inexpensive means to obtain salmon for the year. To further restrict the PU fisheries only restricts available resources to secure food for marginalized populations.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC33**

**Submitted by:** Todd Bergeron

**Community of Residence:** Wasilla Alaska

**Comment:** Don't take away our Dip netting rights!!!!!! We residents need to be able to hunt and fish for our families!!!!!! You need to have your heads examined!!!!!! What makes you think you can take families hunting and fishing right away that live here!?!?!? What is wrong with you people? You like to play God? Most people that dip net depend on that food To help feed their families and dogs. You should be very very ashamed of yourselves you rich Scumbags that don't need to fish for your food!!!!

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## **BERING SEA/ALEUTIAN ISLANDS CRAB OBSERVER OVERSIGHT TASK FORCE**

Date: February 19, 2023

To: Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries

From: Linda Kozak and Jamie Goen, COOTF Co-Chairs

Subject: 2023 Report to the Alaska Board of Fisheries

At the request of board members during the October 2022 work session, the following information is provided for the Crab Observer Oversight Task Force.

### Background:

The Bering Sea/Aleutian Islands Crab Observer Oversight Task Force (COOTF) was formed by the Alaska Board of Fisheries in 1999 and consists of crab industry stakeholders and representatives. The COOTF is charged with interacting and acting in an advisory capacity to the Alaska Department of Fish & Game (ADF&G or Department), as well as report to and be advisory to the Board of Fisheries on issues relating to the state managed BSAI shellfish onboard observer program.

### Purpose:

The purpose of the COOTF is to review and recommend specific action for all aspects of the BSAI crab observer program, including the following:

- Funding mechanisms for observers
- Budget and reserve priorities
- ADF&G suggested program receipt requests

The COOTF meets annually with ADF&G to review reports on the previous year's deployment of observers, along with budgeted and actual costs of the program. The COOTF also reviews and comments on department recommendations for deployment and funding for the program through the test fish receipt authority.

The BSAI crab observer program is funded through Legislative approved test-fish funds and federal crab rationalization funds. Each of the BSAI crab fisheries has a percentage of coverage objective which provides the Department with necessary information to manage the fishery. In 2021, the Department conducted two test fisheries to help fund the observer program, with \$500,000 being received from the harvest and sale of Bristol Bay red king crab and \$300,000 from the Aleutian Islands golden king crab resource.

COOTF Report to the Board of Fisheries



In these challenging times of low crab abundance for important species of the Bering Sea, particularly with Bristol Bay red king crab, there may be a need to consider alternative ways to fund necessary observer coverage. While the traditional cost recovery/test fish program has been used for many years to fund onboard shellfish observers and some program costs, the ability to continue a cost recovery/test fish program may be limited with several crab species at historic low abundance levels. The members of the COOTF will be discussing this important issue and will work with the Department on funding options for the observer program.

The members of the COOTF believe this Task Force has been very successful working in cooperation with the Department for the past 23 years and we are grateful for the support and exchange of information provided by the Department.

We believe our input and ideas have helped shape the Bering Sea/Aleutian Islands shellfish observer program into a cost-efficient and effective program which provides valuable information for the management of the crab stocks of the BSAI.

Currently, there are ten industry members of the COOTF. Following is a brief summary for the members of the COOTF showing their involvement with the Task Force and the crab fisheries of the Bering Sea/Aleutian Islands.

**Jamie Goen, co-chair - Executive Director, Alaska Bering Sea Crabbers**

Since May of 2018, Jamie has worked as Executive Director of the Alaska Bering Sea Crabbers. Her background includes work on crab and halibut boats in Alaska, as well as work with governmental organizations. She previously worked with the International Pacific Halibut Commission, overseeing survey and fisheries data collection programs, as well as a Fishery Policy Analyst with NOAA Fisheries. Jamie was appointed to the COOTF in 2020.

**Linda Kozak, co-chair - Kozak & Associates, Inc.**

Linda was first appointed to the COOTF when it was formed in 1999 and has served as chair or co-chair most of that time. She has been actively engaged in working with Bering Sea and Aleutian Island crab harvesters since 1988. Her focus in recent years has been on the Aleutian Islands golden king crab fishery. Her advocacy on behalf of her clients in the crab fisheries includes regulatory, biological/scientific, political, and marketing issues.

**Lance Farr**

Lance has worked in the crab and pot cod fisheries of the Bering Sea for over 38 years. He served on the Advisory Panel for the North Pacific Fishery Management Council and has been a member of the Pacific Northwest Crab Industry Advisory Committee and the COOTF for at least the past ten years. Additionally, he served on boards of the Alaska Crab Coalition and the Alaska Bering Sea Crabbers.  
COOTF Report to the Board of Fisheries





**Craig Lowenberg – Arctic Sun Fisheries**

Born and raised in Kodiak into a fishing family, Craig has been involved with the commercial fishing industry all of his life. He currently manages and co-owns a vessel that participates in the Bering Sea crab fisheries. He served as a member of the North Pacific Council's Advisory Panel for ten years and has been a board member for Alaska Bering Sea Crabbers and a cooperative manager since 2010. Craig has also been a member of the COOTF since 2016.

**Gabriel Prout – F/V Silver Spray**

Gabriel has been involved in the fishing industry in Alaska since the age of 8. He has fished for halibut, pot cod, and Bering Sea red king, snow, and Bairdi crab. He is part owner in the 116' crab fishing vessel Silver Spray, as well as owner of CVO and CVC crab quotas. Currently, Gabriel fishes and works onboard the Silver Spray as his primary source of income and livelihood. He was appointed to the COOTF in 2022.

**Nikolai Sivertstol – Manager, KRABBE Cooperative**

Nikolai was appointed to serve on the COOTF in 2022. He was born in the United States, but grew up in Norway where he began commercial fishing in his 20's. He has a bachelor's degree in Economics and Business Administration. In the 1990's he established a fishery consulting firm. Nikolai is a board member of the Bering Sea Arbitration Organization, and Alaska Bering Sea Crabbers.

**Joshua Songstad – F/V Handler**

Appointed to the COOTF in 2022, Josh is a fourth generation Alaska commercial fisherman and captain of the F/V Handler. He has fished the Bering Sea and Bristol Bay for over 25 years and has extensive knowledge and experience in the industry which helps to guide a successful path for future generations of both the crab stocks and people who rely on them.

**Jeff Stephan – United Fishermen's Marketing Association**

With a background in commercial fishing and then working as an industry representative, including as an appointed member of the North Pacific Fishery Management Council and a member of the board for the Alaska Seafood Marketing Institute, Jeff has been in the seafood industry for approximately 43 years. He has been a member of the COOTF since it was formed.

**Doug Wells – Owner/Managing Partner of the C/Ps Baranof and Courageous**

A long-time member of the Crab Observer Oversight Task Force, Doug first began his commercial fishing career in 1978 working as a crewmember on the C/P Baranof fishing for crab in the Bering Sea. He transitioned to management of the company in 1996 and then into an ownership role. The catcher-processor vessels target Pacific cod, sablefish and all crab species and fish the longline and pot gear.

COOTF Report to the Board of Fisheries



**Paul Wilkins – Quota Manager, Coastal Villages Region Fund (CVRF)**

Appointed to the COOTF in 2020, Paul has worked with CVRF as quota manager since February 2017. CVRF has made significant vessel investments into the rationalized BSAI crab fisheries, as well as harvesting and processing quota. Paul has worked as an observer in multiple fisheries, including the crab fisheries in the Bering Sea. Additionally, he worked for the Alaska Fisheries Science Center as an observer debriefer and auditor of groundfish observer data. From 2008-2011, he worked as sole office manager for the Fisheries Monitoring and Analysis Division for NMFS in Dutch Harbor.



**Submitted by:** Jessica Bertram

**Community of Residence:** Palmer, Alaska

**Comment:** I fish to fill my families freezer for the winter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Ben Birch

**Community of Residence:** Anchorage, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC37**

**Submitted by:** Richard Bishop

**Community of Residence:** Fairbanks

**Comment:** My family and I have fished for salmon and whitefish for personal and/or subsistence uses since about 1965. As 85 year-olds my wife and I rely on family to take the lead in fishing efforts, whether at Chitina or in the Tanana River near Fairbanks.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC38**

**Submitted by:** Mary Bishop

**Community of Residence:** Fairbanks, AK

**Comment:** Members of our family have fished for decades at Chitina. We have traditionally gotten most of our protein “from the land”. Now that we are octogenarians our grandkids and sons are harvesting for us. We appreciate that and hope it can continue. I oppose proposals 163-167. These proposals unnecessarily restrict or ban our families opportunity to continue using the Chitina fishery. Please reject them.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC39**

**Submitted by:** Richard Blake

**Community of Residence:** Wasilla, AK

**Comment:** My family mostly eats salmon. My wife only eats fish and relies on salmon as her primary protein source. I fish at Chitina and the Kenai. I usually go by myself.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC40**

**Submitted by:** Eric Bleakney

**Community of Residence:** Palmer

**Comment:** As head of household with 98 yo Mom and disabled son the Dipnet fishery is important to us. We have copper river salmon once a week and the amount of fish we eat is hard to get on rod and reel. Dipnetting is a family event every year that includes the whole fish. We put lots of money into the economy too. Commercial nets don't focus on feeding Alaskans, they focus on profit for a few and the fish go elsewhere. Thank you

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:  
Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:

Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**PC41**

**Submitted by:** Elaine Blocker

**Community of Residence:** Eagle River

**Comment:** One of the biggest reasons for relocating our entire family to Alaska was because of the access to resources to feed my family aside from chain grocery stores. With the use of charters to access rivers it provides a safe route to attain our needs.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC42**

**Submitted by:** Frank Boldt

**Community of Residence:** Fairbanks, Alaska

**Comment:** I go fishing all over the state recreationally, including halibut, salmon, etc., and also dipnet for subsistence to provide critical protein to my diet throughout the year at Kesilof. I go with my family (wife, sister, and in-laws) which builds our relationships with each other and provides quality time for us to gather together and provide meaningful food for the year. Dipnetting is a way for us to supplement our resources and save at grocery stores. It is a source of food security. I have also dip netted on the Copper River at Chitna and

find it a little dangerous now because of health reasons and that's why I only go to Kesilof, but I know of lots of friends who rely on Chitna Salmon to provide food security for them.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten the rights of Alaskans and are the first step in a slippery slope to inequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens and more RED TAPE (wasting taxpayer money). Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Deborah Bond

**Community of Residence:** Anchorage

**Comment:** We spend our summer in Soldotna and go dip netting every summer in our boat. My family spends about 2-3 days dipnetting in mid to late July at the mouth of the Kenai. We have been dipnetting on Kenai beach or in a boat at the mouth of the Kenai for about 25 years. My kids grew up doing this every summer, providing us with the fish we eat all winter. We also do bank fishing on the Kenai river near Funny River, but most of our fish are caught dipnetting.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.



**PC43**



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC44**

**Submitted by:** Jerry Books

**Community of Residence:** Soldotna

**Comment:** Leave our dipnetting alone!!!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 87:</b>	<b>Proposal 155:</b>
<b>Proposal 13:</b>	<b>Proposal 153:</b>	<b>Proposal 156:</b>

Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC45**

**Submitted by:** Justin Boots

**Community of Residence:** Fairbanks, AK

**Comment:** I participate in the personal use fishery to help offset the cost of living in Alaska. We are a family of 4. We fish at hailey creek from our boat. I fish with my family and friends 2 single dads one with three children the other has 1. This fishery is very important to them.

I personally believe the commercial fisherman should be restricted more to allow the sport fisherman to also be able to enjoy a great fishery. Perhaps they could fish every other day. Instead of everyday. I also believe they should have a quota. Figure out what they need to cover operating expenses and a suitable salary. Calculate the average rate received for the fish over the last ten years. When they reach that amount, they're done!

Thanks

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



I have been commercial fishing in Bristol Bay on board a gillnetter since 1990 and have owned a permit since 2002. My husband and I continue to drift in Bristol Bay and currently hold 2 permits which we fish as a Dual on board F/V Winter Blues.

My Comments on the Alaska Board of Fish and Game Nushagak River King Salmon Action Plan:

Option 1. Status Quo could be used until a better method of King Salmon Escapement Assessment is provided. Commercial fishermen have already given up targeted King fisheries since 2014 and have suffered much economic loss due to over escapement of sockeye stocks without a reliable way to enumerate King Salmon Escapement accurately.

Option 2. Develop Wood River Special Harvest Area early fishing regulations could be a useful tool to reduce numbers of King Salmon caught. However, allowing 700 to 800 boats to fish in the Wood River is bad for the Wood River ecosystem causing lots of bank erosion. In addition this seems like a physical impossibility using only 3 dimensions unless the number of boats within the district is restricted by a semi-super-exclusive clause. Thus, boats that drop their blue cards in the Nushagak District would not be able to fish in or transfer to any other river district before July 3 or boats from other river districts would not be allowed to transfer into the Nushagak until July 3. This could sunset every year and be determined as a good tool for Fish and Game by Fish and Game in the next year.

Option 3. Creating an Optimum Escapement Goal for Nushagak River does not seem to have any benefits.

Option 4. Reducing mesh size could help reduce number of King Salmon caught or at least harvested; many times larger fish of all species are caught but then fall out of the gear, dead, before they land on the deck. Reducing gear length would have to be done in a fair way for both set net and drift fleet gear.

Option 5. Area Size Reduction may help reduce King Harvest but this should only be utilized if Reduced Area can be fully utilized by drift fleet by: A. Prohibiting Tenders and Processors from anchoring in District AND B. Prohibiting Un-used Set Net Anchors during fishing openers.

It might reduce King Salmon catch and still allow Sockeye Salmon Fishing if there were an Increase in Area of the Nushagak General District to the South while Reducing the Area to the North thereby allowing for shallow nets in deeper water which allows the King Salmon to swim underneath the fleet.

Option 6. Closing commercial fishing seems like a bad idea on many levels ie over escapement, loss of fishermen's income, loss of tax base, loss of sanity.

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Proposal 11: Support With Amendments  
Proposal 12: Support With Amendments  
Proposal 13: Oppose



**Submitted by:** Ubon Boutsomsi

**Community of Residence:** Anchorage

**Comment:** As an Alaskan of 20+ years. Fishing is apart of me and my family. We dipnet to fill our freezers and feed the family throughout the year. Dipnet is very important and vital part of many Alaskan lives.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Geoff Boyda

**Community of Residence:** Anchorage, Alaska

**Comment:** I love fishing everywhere I go in Alaska including the Copper River.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Lawrence Brackett

**Community of Residence:** Kenai, AK

**Comment:** I and my family have been blessed with the salmon that come to our pantry, having dip netted since the mid 90's from the beach and from our boat. My wife, along with our children, and now their families, have enjoyed the opportunity to get our fish to supplement our groceries.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.



**PC49**

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC50**

**Submitted by:** Debra Brackett

**Community of Residence:** Kenai

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC51**

**Submitted by:** Deedra Bradford

**Community of Residence:** Soldotna, AK

**Comment:** My family and I fish all over the state as a harvest to help offset our grocery expenses.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
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Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jim Brady

**Community of Residence:** Sterling

**Comment:** Live and fish on the Kenai River as well as throughout the State of Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.



**PC52**

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Kevin Branson

**Community of Residence:** Soldotna

**Comment:** I have been in Alaska for over 40 years. I live here because my family and I love to fish and hunt and enjoy the Alaska outdoors. I primarily fish on the Kenai River.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	





**Submitted by:** Rebecca Branson

**Community of Residence:** Soldotna, AK

**Comment:** I fish to supply my family great seafood, not terrible farmed fish. I fish so that my children and grandchildren will learn the meaning of from river to table and how many life lessons are experienced by gathering your own food. I fish on the Kenai River as it is next to my house.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Berkleigh Brauer

**Community of Residence:** Juneau, AK

**Comment:** I fish the Copper River with my mom each year. The subsistence fishing is so important to us. We are unable to do this from shore and rely on the chartered access.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jeremiah Brewer

**Community of Residence:** Eagle River

**Comment:** My family and friends fish the Kenai river both in subsistence and sport fishing. This valuable resource is for all Alaskans to enjoy and should be preserved and protected for all. These proposed regulations provide an unfair advantage toward the commercial fishing community whose current practices are already causing substantial harm to the Kenai River ecosystem. These proposed regulations will have little to no impact in regards to preservation of the Kenai River ecosystem.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.



**PC56**

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 11:**  
**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



## Bristol Bay Fishermen's Association

P.O. Box 60131  
Seattle, WA 98160  
Phone/Fax (206) 542-3930



February 21, 2023

ATTN: BOF COMMENTS  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 25526  
Juneau, Alaska 99802-5526

The **Bristol Bay Fishermen's Association (BBFA)** submits the following positions on proposals for the Statewide Board of Fisheries meeting.

BBFA is neutral on proposals 157 and 158.

BBFA supports proposals 166 and 167.

BBFA supports maintaining the current Nushagak Chinook salmon management plan.

BBFA represents permit holders who fish for salmon in Bristol Bay. Our mission is to protect the renewable salmon resource and promote economic sustainability for commercial salmon permit holders in Bristol Bay.

Thank you for the opportunity to submit our positions on proposals.

Sincerely,

Luke Peterson  
President

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 166: Support  
Proposal 167: Support



## **BBRSDA's BOARD OF FISHERIES COMMENT FOR STATEWIDE MARCH 10-13 MEETING**

The Bristol Bay Regional Seafood Development Association (BBRSDA) is a fishermen's association whose primary activities involve the marketing and promotion of Bristol Bay salmon. The purpose of this comment is to provide information for constructive discussion and ideally achieve a set of decisions that are consistent with Alaska's fishery management principles, which are structured to utilize state resources for the greatest benefit of Alaskans. We believe pragmatic decisions will represent improvements to the commercial fishing industry and maximize the sustained yield<sup>1</sup> of product available for sale and promotion. Our organization is funded and directed by commercial driftnet fishermen; however, we have solicited input from setnetters on this matter as well.

This comment, intended for Board of Fish (BOF) members, Alaska Department of Fish and Game (ADF&G) staff, and the broad collection of Nushagak salmon stakeholders, addresses three topics:

1. Relevant facts for consideration (pages 1-7)
2. Guidance based on Alaska's resource management directives (page 8)
3. Proposed recommendations (pages 9-10)

### ***Relevant Fact #1: We do not have sufficient information to make reasonable decisions.***

Chinook salmon are not being reliably counted. We do not have a good count on how many Chinook are going up river. The sonar being used to count Chinook salmon was developed for sockeye salmon and has been shown to undercount Chinook by 19 to 65% annually.<sup>2</sup> The sonar beam does not illuminate the whole river channel and specifically misses the middle/deeper part of the river where Chinook often migrate. Importantly, sockeye push Chinook offshore during migration<sup>3</sup> - a fact that could make Chinook escapement counts even more unreliable in recent years where sockeye abundance is at an all-time high. Additionally, the apportionment netting system can provide unreliable information during years/periods with large sockeye runs. How can we aim to rebuild a salmon stock we cannot count, and whose index is so variable?

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<sup>1</sup> Native Village of Elim v. State, 990 P.2d 1, 5-7 (Alaska 1999).

<sup>2</sup> ADF&G staff. 2023. Nushagak King Stock Status and Action Plan. Pages 19-20.

<sup>3</sup> Maxwell, S. L., G. B. Buck, and A. V. Faulkner. 2019. Using acoustic telemetry to expand sonar escapement indices of Chinook salmon to in-river abundance estimates. Fisheries Research 220: 105347. <https://doi.org/10.1016/j.fishres.2019.105347>

Chinook salmon harvested by human user groups in the Nushagak river are also not being counted with enough accuracy.

In the high-volume Bristol Bay sockeye fishery, it's believed that Chinook are often not identified separately when offloading to tenders. This occurs for a variety of practical, hard-to-enforce reasons. Fishery managers could get a more accurate count of Chinook harvested in the commercial fishery if they required processors to provide data from inside plants. Plant managers know exactly how many Chinook are coming in. Test fishing could provide more timely data, as well (since plant-level counts lag behind harvests somewhat).

Surveys of the sport and subsistence fisheries provide a very rough estimate of fish retained, after the season; as well as a poor account of actual mortality. However, the lack of in-season harvest estimates represents another lost opportunity to gather data to inform fishery decisions. There are dozens, if not hundreds, of sport fishermen targeting Chinook salmon every day. It would seem that a creel survey or some other form of data gathering to measure their success could provide valuable information. If they are having good success catching Chinook, there's likely a lot around and vice versa; but currently we have nothing beyond sporadic anecdotal reports and post-season retained harvest figures.

Speaking of retained sport harvest figures, there is conflicting evidence that suggests recent years have not seen such a dramatic decline in Chinook abundance. From 2018-2021 the harvest per angler days fished averaged 0.49 Nushagak Chinook from Black Point to the Mulchatna River mouth, but only averaged 0.42 from 2012-2015.<sup>4</sup>

In mid-January 2023, BBRSDA Executive Director Andy Wink reached out to ADF&G staff with a reasonable question: have lower Chinook harvests (by commercial and all other user groups) tended to result in rebuilding king stocks in the Nushagak or elsewhere? Disappointing king returns isn't a new problem in Alaska, or one unique to the Nushagak area. Are management decisions aimed at rebuilding Chinook stocks working or are they not, and at what cost? BBRSDA never received a response to this question, but we believe it is a valid question which the BOF should direct the Department or hire an independent investigator to answer.

### ***Relevant Fact #2: Commercial Chinook harvests are already down 82%***

Although the commercial Chinook harvest figures of Nushagak fish are imprecise, the overall trend shows a dramatic decline in recent years. The average commercial Chinook

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<sup>4</sup> Derived from ADF&G sport fishing survey data available here:  
<https://www.adfg.alaska.gov/sf/sportfishingsurvey/index.cfm?ADFG=area.home>

harvest from 2015-2019 was 33,668 fish and fell to just 5,901 from 2020-2022; a decline of 82%!<sup>5</sup> How much Chinook productivity do we stand to gain by reducing this harvest further, and at what cost - both in terms of foregone economic benefits and potential biological effects on both Chinook and sockeye? Even if there was no commercial fishing during the 2022 season (which saw a mega-record sockeye harvest), the lower range of the Nushagak Chinook escapement goal still would not have been reached.

The obvious “medicine” for struggling salmon runs is to get more fish upriver to spawn, but clearly this treatment is already being applied with a significant dosage. The data clearly suggests area fishery managers are *already* doing an excellent job of restricting king harvests, although it has likely contributed significantly to foregone harvests of sockeye. Can we reasonably expect to gain much more Chinook productivity by further restricting commercial sockeye harvests?

The next several seasons will tell us if the management actions to curtail commercial Chinook harvests were successful, with as much accuracy as the data systems can provide. But what if Chinook runs continue to struggle? Is the answer to then have the patient drink the whole bottle of NyQuil, no matter the cost or likelihood of success? Maybe our doctors are not prescribing the right medicine to fight the cause of this affliction (see Fact #1)?

***Relevant Fact #3: We do not know if sockeye abundance affects Chinook productivity***

Obviously, one logical way to get more Chinook upriver is to constrict commercial fishing, but how certain are we that this will achieve the goal of more kings? One thing is almost certain with such an action, sockeye escapement will increase, perhaps significantly (above levels already far exceeding escapement goals). A literature review commissioned by BBRSDA (attached to this comment) shows unsurprising evidence that salmon mortality tends to increase with higher smolt density. More fish upriver, smaller smolts, less available resources, and generally higher mortality. However, there is relatively little research available about the effects of inter-species abundance. We could not even find a simple correlation analysis about the general trends of sockeye and Chinook, though clearly it's been an inverse correlation in the Nushagak in recent years.

The most important takeaway from the literature review in regards to Nushagak Chinook management is: we don't know if there is a break-even point where the productivity costs of larger sockeye escapements reduce the benefit of additional Chinook spawners. It's very

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<sup>5</sup> As previously explained, commercial harvest statistics for Nushagak Chinook are imprecise, but are very likely to be miscounted in similar proportions each year, thereby making the overall scale of the decline similar even if we had access to more accurate harvest data.

possible the trade-off of putting many more sockeye upriver to get a relatively small number of kings upriver will ultimately be both extremely costly and counter-productive.

***Relevant Fact #4: There are more compelling causes for poor Chinook productivity than fishermen intercepts***

Restricting commercial fishing to put more Chinook upriver is just one “treatment” that is the most commonly prescribed, but depending upon the cause for declining populations, this strategy may either not work, or not be worth the cost. You can’t put more salmon upriver if there simply aren’t as many coming back (as are needed to reach the escapement goal). There are other options and potentially many other reasons why some king stocks are declining. To name a few, marine mammal predation, sufficient marine/freshwater food supplies, disease, egg counts, and spawning success rates.

The literature review did find ample research on several factors related to Chinook productivity:

- Age-at-maturity (e.g., jacks)
- Sex ratio
- Predation (e.g., orcas)
- Chinook size
- Catch-and-release mortality

Admittedly, it is difficult to control all these factors as human fishery managers, but even for natural factors, such as age, size, and sex ratio, fishery management can tip the scales. Commercial gillnets targeting sockeye tend to catch more jack/male Chinook, as opposed to larger females. These fish tend to have a minimal contribution to spawning productivity. Politically, they may be counted as equals, but objectively they have relatively less impact on king production than fish eaten by orcas or retained by other gear groups.

Notably, a study by University of Washington researchers estimates killer whales consumed well over 20 million pounds of Chinook salmon in 2010 along the coasts of Alaska, Canada, and the Pacific Northwest each year – more than 3 times the number of salmon currently harvested by humans.<sup>6</sup> And killer whales prefer the biggest, most fecund Chinook. Also, keep in mind that 2010 estimate is now over 10 years old and if Northern resident orca populations have continued on their upward trajectory, the volume of Chinook lost to predation could be much higher.

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<sup>6</sup> Ohlberger et al, 2019. Resurgence of an apex marine predator and the decline in prey body size. Proceedings of National Academy of Sciences. <https://www.pnas.org/doi/10.1073/pnas.1910930116>



Orcas are just one extremely reasonable explanation for declining Chinook abundance across Alaska, but in the Nushagak the size and sex ratio of fish is also of interest. The *average* weight of commercially-caught Chinook in Bristol Bay during 2022 was 8.6 pounds, and if harvest statistics were more accurate the average weight would likely be even lower (because smaller Chinook are more likely to be counted as sockeye). A dearth of females and relative abundance of jack males reduce stock productivity, and that clearly appears to be the trend for Nushagak Chinook.

***Relevant Fact #5: The economic cost of sockeye overescapement is enormous***

Preserving Nushagak kings is a laudable goal; however, the Alaska Supreme Court has held that “the duty to conserve and develop fishery resources implies a concomitant power to allocate fishery resources among competing users.”<sup>7</sup> That is, although the Board can act to protect that fishery, it must do so with an eye towards protecting the resources and rights of competing users.

Minimizing the harvest of Nushagak Chinook salmon greatly increases the chances for overescapement of sockeye. At a big enough scale, this could pose a threat to sockeye run strength. In the near term, sockeye overescapement has a significant economic cost for fishermen, processors, and government.

Overescapement in the Nushagak commercial salmon fishing district produced a foregone ex-vessel harvest of 23 million sockeye worth \$159 million from 2017-2022. Think about that! That’s just the value of sockeye NOT caught above the upper escapement goals in the Nushagak, Wood, and Igushik rivers. And most importantly, this is with the *current* management structure. Restrictive management actions would, all things equal, likely result in even more foregone harvest effects. Overescapement occurs for a range of factors, but in the Nushagak, delaying early season fishing to allow passage for Chinook salmon is a big reason.

It is clear that conservation of the Nushagak Chinook is a priority for the board. However, “conservation” refers to the “controlled utilization of a resource to prevent its exploitation, destruction or neglect.”<sup>8</sup> Ironically, if the Board decides to allow aggressive overescapement of the sockeye fishery, it could lead to “destruction and neglect” for that fishery, while providing no marginal benefits to the Chinook. Before aggressive, costly changes are made, it makes sense to work on getting better enumeration data and seeing if lower king harvests during the 2019-2022 period result in better returns.

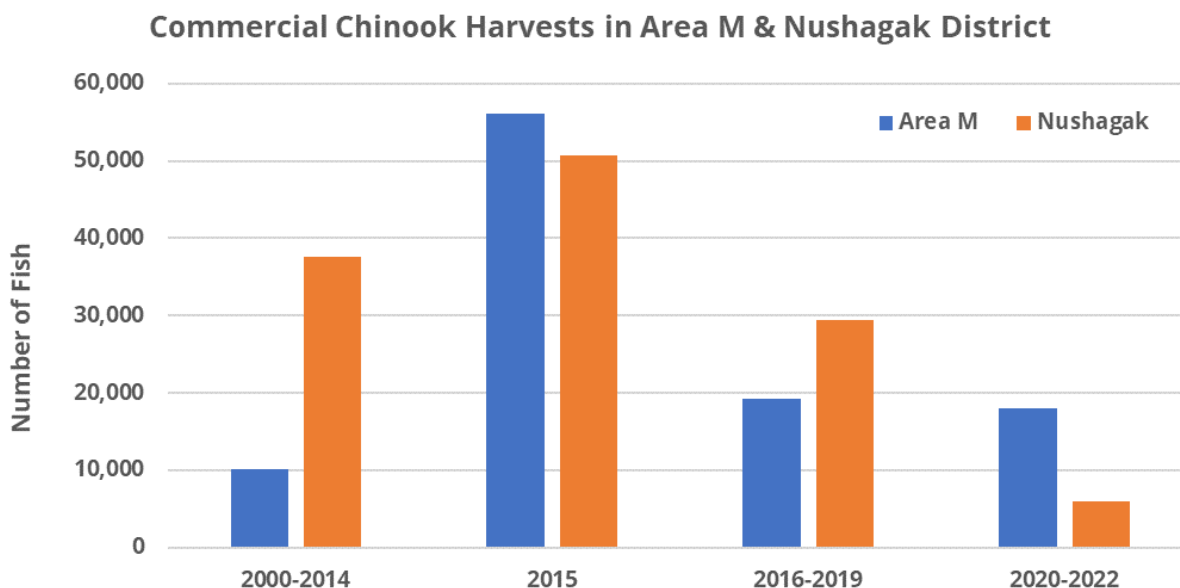
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<sup>7</sup> Kenai Peninsula Fisherman's Co-op Ass'n v. State, 628 P.2d 897, 903 (Alaska 1981)).

<sup>8</sup> Alaska Fish Spotters Ass'n v. State, Dep't of Fish & Game, 838 P.2d 798, 800 (Alaska 1992).

**Relevant Fact #6: Area M caught far more Chinook than normal in 2015 and have continued to harvest more than Chinook (compared to 2000-2014)**

Look closely at the chart below, and keep in mind that mature Chinook are often 4-6 years old when they return to spawn:



Source: ADF&G.

Commercial fishermen in Area M caught 56 thousand Chinook salmon in 2015, over five times as much as they typically caught in previous seasons. Nushagak commercial fishermen also caught a lot of Chinook that year, but it was a much smaller increase compared to previous harvests. Since 2015, commercial harvests of Chinook have trended down sharply while they are nearly twice as high in Area M (compared to the 2000-2014 period).

It is concerning that we see a five-fold increase in Area M Chinook harvest in 2015, and then five years later Nushagak Chinook returns and harvests plummet. All user groups in the Nushagak have been affected by lower Chinook runs in some fashion, yet it appears that Area M fishermen are catching more Chinook than they used to. This hardly seems fair. If one group is being forced to conserve Chinook resources, it seems fair that other groups also participate in conservation measures.

***Relevant Fact #7: The Nushagak is Alaska's most valuable commercial salmon fishing river***

Over the last five years (2018-2022), Bristol Bay sockeye have accounted for 50% of Alaska's entire commercial salmon harvest value (in ex-vessel terms).<sup>9</sup> The Nushagak has accounted for 39% of Bristol Bay's sockeye harvest during that same stretch, by far the most of any other district.<sup>10</sup> The Nushagak is Alaska's most valuable commercial salmon fishing river, and while it has a lot of nonresident involvement, 51% of permits are owned by Alaskans from nearly every borough or census area in the state. We won't write this twice, even though it bears repeating. Please keep this in mind when considering changes that could have substantial impacts on commercial salmon fisheries in the Nushagak district.

It is important to realize that dollars earned from Nushagak sockeye don't just benefit the fishermen, processors, and local community. Alaska's commercial salmon fisheries are vast, remote, and extremely capital intensive. It takes hundreds of millions of dollars to cover the annual cost of having processing operations across the state, and in recent years no other river system has been as important as the Nushagak in providing the scale necessary to bear these costs. Unless it's somehow made up for elsewhere (and it's hard to predict that happening), a significant reduction in Nushagak sockeye harvest will likely make it harder to operate salmon plants across Alaska.

Salmon is the foundation of Alaska's commercial seafood industry outside of the Aleutians. Therefore, keeping the Nushagak sockeye fishery robust is obviously in the best interest of Alaska's economy.

***Relevant Fact #8: Lots of days late and many dollars short***

Chinook enumeration problems have been well-known for many years. Unfortunately, those problems were not addressed and now the situation has become more dire with Nushagak Chinook being labeled a "stock of concern." Alaska is a big place with lots of fish and user groups for the BOF and ADF&G to oversee; however, given the unique importance/scale of the Nushagak sockeye fishery – addressing the various problems ought to be one the Department's top priorities.

NOAA Fisheries currently has a grant program with over \$160 million in funding to help replenish Pacific Salmon stocks.<sup>11</sup> These funds can only be provided to western states with

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<sup>9</sup> Derived from published ADF&G ex-vessel data.

<sup>10</sup> Derived from 2021 Bristol Bay Annual Management Report and 2022 Bristol Bay Salmon Season Summary.

<sup>11</sup> <https://www.fisheries.noaa.gov/grant/pacific-coastal-salmon-recovery-fund>

Pacific Salmon (including Alaska) or federally recognized tribes. As Nushagak Chinook are an important stock for Native subsistence fishing, our assumption is many research needs would qualify for funding. This program requires a match funding commitment of 33%, meaning it could triple the amount of funding set aside for a project.

It's unfortunate that we do not have better fish counts or more funding set aside to tackle this issue, but that's water under the keel now. Going forward, we need a proactive strategy to fund science and research to fill these gaps, as soon as possible.

### ***Guidance based on Alaska's resource management directives***

The Alaska Department of Fish & Game's (ADF&G) mission is:

*To protect, maintain, and improve the fish, game, and aquatic plant resources of the state, and manage their use and development in the best interest of the economy and the well-being of the people of the state, consistent with the sustained yield principle.*

The Board of Fisheries (BOF) main role is to conserve and develop the fishery resources of the state. The BOF has the authority to adopt regulations described in AS 16.05.251 including: establishing open and closed seasons and areas for taking fish; setting quotas, bag limits, harvest levels and limitations for taking fish; and establishing the methods and means for the taking of fish. BOF members are instructed to utilize the "best available science" in reaching decisions that affect the management, conservation, and development of Alaska's fishery resources.

These directives are extremely important to keep in mind when considering how to deal with Nushagak Chinook salmon, which have been labeled a "stock of concern."

Therefore, we believe the guiding questions for BOF members and ADF&G staff regarding this situation are:

- Do we have adequate data/science to make an informed decision?
- If changing environmental factors are creating a new paradigm, are the old escapement goals reasonable?
- What is in the best interest of the economy and well-being of Alaska's, in accordance with the sustained yield principle?
  - Is it in their best interest to do anything differently?
  - If changes are made, what is the cost/benefit justification?

- If the costs clearly outweigh the risk-adjusted benefits, then are those good choices consistent with ADF&G and BOF directives?

### ***Proposed Recommendations***

The Board's current plan of action appears unsupported by science or the Board's statutory goals. Although the Board has broad discretion, its policies must at least be supported by a "reasonable basis."<sup>12</sup> Given the lack of science and data supporting a conclusion that the proposed actions will materially benefit the Nushagak Chinook fishery (and given the strong indications that the actions will cause damage and waste in the sockeye fishery) no reasonable basis for the current plan exists.

Additionally, the current plan completely ignores the fact that, in addition to conservation, the Board should also focus on economic development and commercial utilization of the fishery resource.<sup>13</sup> As the Board itself has acknowledged in the past, "if participation in a fishery becomes cost-prohibitive, the fishery will no longer be viable and fishery resources will not be developed at all."<sup>14</sup> The path the Board is currently on could indeed make the sockeye fishery cost-prohibitive. But there is a better path available to the Board that can better serve both conservation of the Nushagak Chinook, while at the same time avoiding undue harm to the sockeye fishery.

Based on the facts presented above and successful fishery management principles that have served Alaska well for decades, we recommend the BOF and ADF&G take a different course of action:

1. Prioritize and improve scientific research and data collection, before making significant changes to Nushagak salmon management regulations (that affect both Chinook and sockeye):
  - a. Develop a better method to enumerate Chinook escapement.
  - b. Require large salmon processors to provide daily reports of Chinook purchased (improving upon fish ticket counts).
  - c. Implement a creel survey to better count sport-fish harvest (both retained and catch/release).

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<sup>12</sup> Native Village of Elim v. State, 990 P.2d 1 (Alaska 1999).

<sup>13</sup> Grunert v. State, 109 P.3d 924, 930 (Alaska 2005).

<sup>14</sup> Id.



- d. Incentivize or otherwise improve subsistence harvest surveying.
- e. Fund research about the potential efficacy and practicality of implementing Chinook migration corridors in the Nushagak district, to allow for Chinook migration while avoiding costly fishery closures.
- f. Research Chinook salmon mortality estimates in sport fisheries.
- g. Fund collaborative research to better understand why Nushagak Chinook production is struggling.
- h. Conduct an efficacy analysis and cost/benefit study of BOF decisions regarding decisions aimed at rebuilding Chinook salmon stocks.

2. We recommend that the BOF and ADF&G develop a methodology for changing the lower SEG for Nushagak Chinook to dynamically adjust for fluctuations in fish abundance. Last season, this was an impossible goal putting fishery managers in a tough position, and the few seasons before 2022 weren't far off. We need SEG ranges that fit the world we live in; no amount of bureaucratic wrangling can change that fact (short of more ambitious measures). A trigger for increasing sockeye escapement goals has been floated, but what about a basis/trigger for reducing Chinook escapement goals that is more appropriate to recent stock abundance?

3. We recommend exercising caution and precision involving changes to commercial fishery regulations that could result in significant foregone sockeye harvests, ideally continuing with mostly status quo sockeye regulations until better data/science can be provided to inform future decisions.

4. In exchange for more commercial fishing time, consider actions to restrict subsistence harvests of Chinook and supplement those harvests with guaranteed Chinook donations by the commercial sector, pending community input/support. It makes little sense to export these precious Chinook out of the region when they essentially amount to an unfortunate bycatch. This would allow local residents even wider access to local Chinook resources. BBRSDA would consider contributing to the cost of this effort and supporting quality handling/processing procedures.

5. More specifically, we recommend adopting Proposal 12 for the Nushagak-Mulchatna King Salmon Management Plan, rejecting Proposal 11 (except for items #3, #6, #7, and #8), and rejecting Proposal 13.



**Investigating the effects of sockeye salmon abundance on Chinook salmon with special  
consideration of commercial fisheries in Bristol Bay, Alaska: a literature review**

**Prepared by Stephen Klobucar, Ph.D., independent contractor, on behalf of the Bristol Bay  
Regional Seafood Development Association**

**February 2023**

**Statement of Need**

In recent years, widespread declines of Pacific salmon stocks (e.g., abundance of returning adults, size and/or age of returning adults) have been well-documented across native ranges (e.g., Lewis et al. 2015; Oke et al. 2020). These declines have been attributed to a multitude of abiotic and biotic factors across different populations, species, and life histories. 'Portfolio effects' buffer region-wide populations across space and time (e.g., Schindler et al. 2010), though these are generally described for population dynamics of single species.

As such, it is difficult to disentangle intra- and interspecific dynamics of fisheries at various life-stages of Pacific salmon species in efforts to balance management and biological objectives (e.g., Lamborn et al. 2023), especially within mixed-stock fisheries such as the Nushagak River, Bristol Bay, Alaska.

In October 2022, after failing to meet the in-river run goal of 95,000 over five of the past six years, Nushagak River Chinook salmon were recommended as stock of management concern by the Alaska Department of Fish and Game. Concurrently, returns of sockeye salmon in the Nushagak District and broader Bristol Bay area have reached record numbers in recent years.

Due to the nature of the Bristol Bay fishery, and management objectives, we require a better understanding of how these species interact, specifically with regard to potential density-dependent effects across multiple life stages and habitats. Given recent record returns of sockeye salmon and the decline of Chinook salmon in the district, coupled with changing conditions in ocean and freshwater environments, the direction and magnitude of potential effects increased sockeye escapement may have, directly or indirectly, with regard to Chinook salmon is uncertain.

## Objectives and Methods

The primary goal of this literature review was to summarize our current knowledge with regard to potential effects of sockeye salmon abundance on Chinook salmon abundance and production across salmon life stages. As a secondary goal, this review, when applicable, draws upon available literature to infer potential effects other salmon species abundances have on Chinook salmon abundance and production. In combination of these goals, we also aimed to identify knowledge gaps that could be addressed to better understand how salmon species interact under variable population abundances to inform potential management actions in the future.

Literature searches were conducted in February 2023, with a focus on peer-reviewed journal articles, but relevant reports were also included. Due to the nature of relatively recent declines in Chinook salmon populations as a whole, an emphasis was placed on relevant literature published since 2010. Additionally, owing to the specific objectives above, searches via Google Scholar and combinations of search terms focused on potential biotic interactions (e.g., ‘density-dependent’, ‘competition’, ‘abundance’, ‘productivity’) between sockeye and Chinook salmon (e.g., ‘*Oncorhynchus*’, ‘Chinook salmon’, ‘sockeye salmon’) at specific life stages (e.g., ‘juvenile’, ‘smolt’, ‘spawner’, ‘migration’) which started with narrower geographic search terms (e.g., ‘Nushagak’, ‘Bristol Bay’) and broadened to region scales (e.g., ‘Alaska’, ‘North Pacific’).



## Summary

Generally speaking, peer-reviewed literature that specifically examines interspecific interactions between sockeye salmon and Chinook salmon is very limited (<5% of peer-reviewed articles referenced below). As alluded to, much of the research on Pacific salmon population dynamics, as a result of abiotic and/or biotic factors, is focused in the context of a single species at variable scales of time and space. Environmental factors (e.g., climate change, ocean conditions, stream temperature, stream flow) are often important drivers investigated and attributed to describe salmon populations, in part, owing to the availability and accessibility of long-term environmental data. Said another way, obtaining biological data to examine long-term trends, or even short-term changes, especially for highly variable populations such as Pacific salmon in variable environments can be logistically challenging and/or cost prohibitive. Therefore, biological data for salmon stocks is often obtained from fisheries (e.g., harvest data re: sex, size-at-age) and thereby, retrospective (e.g., growth from scales). However, focusing future research on relevant gaps in biological information is essential, albeit complex, to not only better inform management decisions, but to also better understand the ecology of valuable salmon species as a whole. Accordingly, this literature review has perhaps raised more questions than answers with regard to direct and indirect biotic interactions between salmon species (e.g., sockeye and Chinook).

To that extent, and adjacent to objectives from the onset of this review, much of the information summarized here focuses on one species (e.g., sockeye or Chinook) in the context of potential effects to other species. That is, how do returning sockeye adults affect Chinook adults (and vice versa)? How do sockeye juveniles affect Chinook juveniles (and vice versa)? How do different numbers of adult (or juvenile) sockeye salmon affect Chinook salmon (and vice versa) from year-to-year? Are these effects for adults and/or juveniles cumulative?

For example, as a body of literature recognizes the role of density-dependent effects controlling juvenile sockeye salmon and Chinook salmon separately (e.g., juvenile sockeye salmon growth may be slower/decreased when there are more juvenile sockeye mouths to feed), it could be prudent to better

understand the interplay of density-dependence where these species are likely to overlap, such as areas of the Nushagak River network (e.g., Is there enough food in the right habitats to feed all the juvenile salmon mouths?). Of course, environmental factors (e.g., temperature, because fishes are cold-blooded) are also relevant to food and habitat availability, and other potential interactions between salmon species.

While not all-inclusive, the questions posited below could be the focus of, and may require, specific literature reviews to begin fully working towards goals addressing direct and indirect effects of interspecific salmon interactions. In other words, ‘we don’t know what we don’t know.’

## **Literature Review**

### ***What We Do Know***

Annually, Chinook salmon arrive at the Nushagak District prior to sockeye salmon, however, there is considerable overlap between the runs (Head and Hamazaki 2022), and further, little is known about how spawner abundances (and/or density) of each species may affect one another, directly or indirectly, throughout stages of upstream migrations, spawning behaviors, and overall, spawning success. However, at present, the abundance of returning Chinook in the Nushagak is difficult to ascertain during runs as enumeration methods have been shown to be relatively unreliable due to lack of coverage and methodology that was developed for sockeye salmon rather than Chinook (Maxwell et al. 2019). Moreover, annual variability in abundances of freshwater stage juvenile salmon, as a result of returning adults (e.g., record returns of sockeye), is likely to manifest in density-dependent effects for conspecifics (e.g., Crozier et al. 2010), and potentially, between species. Even less is known about the dynamics of juvenile Chinook prior to entering the marine environment (e.g., smoltification; Schwanke 2014), though early marine survival is often attributed to returning Chinook abundances (e.g., Cunningham et al. 2018).

Brennan et al. (2019) examined the variability of salmon production in both natal and juvenile-rearing habitat across years for the Nushagak River network for both sockeye and Chinook salmon using stable isotopes ( $^{87}\text{Sr}/^{86}\text{Sr}$ ) from otoliths of returning adults. Thus, this research provides some inference

for these species interacting at multiple life stages. For Chinook salmon, relative production shifted from the upper Nushagak River in 2011 to the Mulchatna River in 2014 and 2015. While isotopic comparisons for sockeye salmon production were not available for 2011, in 2014, sockeye salmon relative production was generally concentrated in the Tikchik lakes region, as well as the upper Nushagak (e.g., areas of Chinook salmon production in 2011). In 2015, sockeye salmon production was more distributed in across riverine habitats indicating greater overlap of production, and thereby habitats, between the two species (see Figure 1; Brennan et al. 2019). Notably, Chinook escapement was estimated as 101,995 adults in 2011, 62,679 in 2014, and 91,090 in 2015. Sockeye escapement was estimated as 428,191 adults in 2011, 618,493 in 2014, and 796,684 in 2015. Overall, this novel work describes how habitat variability can stabilize interannual production across the river network (see also Brennan and Schindler 2017), and, in turn, provides potential directions for future research, which, in part, organizes the remainder of this literature review (e.g., *What We Don't Know*)—

***1) What is the prevalence of riverine habitat where spawning sockeye and Chinook overlap?***

The aforementioned work of Brennan et al. (2019) highlights the interannual variability of production for both sockeye and Chinook salmon in the Nushagak. This work was for 2014/2015 brood years—*how does this compare for years of extreme sockeye runs? When do successful Chinook spawners enter the district?*

Daigneault et al. (2007) also examined migrations and spawning areas for adult Chinook and sockeye in the Nushagak River in 2006 using radio telemetry. In 2006, the King Salmon, Koktuli, mainstem Mulchatna, and mainstem upper Nushagak were important spawning areas. The Nuyakuk, King Salmon, and Koktuli rivers were important for sockeye salmon spawning in 2006. Notably, the Nuyakauk River sockeye run in the lower Nushagak was 5 – 7 days later than other sockeye runs. Daigneault et al. (2007) also reported different allocations of sockeye spawning distributions (31% Nuyakuk, 69%

Mulchatna) based on tower estimates at Portage Creek and the Nuyakuk relative to their work with radiotelemetry (46% Nuyakuk, 32% upper Nushagak, and 22% Mulchatna). Comparatively, at the time of Daigneault et al.'s report, ADF&G estimates suggested the contribution of Mulchatna sockeye to the total Nushagak run was in the range of 68 – 84% since 1998.

In the nearby Togiak, Chinook arrive a little later than the Nushagak, but densities of spawners are historically relatively similar as a function of watershed area (Sethi and Tanner 2014). In this system, tributary spawners tend to run earlier than mainstem spawners, though mainstem spawners are much more numerous (~85% of returners), and males also arrive earlier than females (Clark et al. 2015). Previous aerial surveys suggested that successful spawners reached upper river reaches, however, radio-tagged returners showed more spawning occurs in lower to mid-river reaches, where the water is deeper and more turbid, which in turn, suggests further unknown and variable abundances by visual counts. Meggers (2018) describe physical habitat of Chinook spawning distribution in the Togiak (e.g., 80% spawned in waters temperatures 8.6 – 9.4 C).

Daigneault et al. (2007) also reported difficulties during spawning ground surveys (non-motorized float surveys) due to high and turbid water, which could affect overall escapement estimates (see Question 2 below). They surveyed only a total of 12 Chinook carcasses between the Koktuli and King Salmon Rivers in mid-August 2006 whereas as 19 and 31 radio-tagged adults were tracked to these rivers, respectively.

Within the above Question 1, other sub-questions may include:

- *How do variable spawning densities of each species affect one another's access, behavior, and/or success (e.g., prespawn mortality) on spawning grounds?*

For adult sockeye in the greater Bristol Bay region, recent record returns are associated with observed decreases in size of returning sockeye owing to intra- and interspecific competition in the North Pacific Ocean (Ohlberger et al. 2023).

For sockeye salmon alone, prespawn mortality is greater in years and systems with larger runs of spawners (Quinn et al. 2007). In relatively small spawning tributaries, low dissolved oxygen can trigger prespawn mortality of sockeye, as a result of flow conditions and spawning density (Tillotson and Quinn 2017). Interestingly, in this work, spawners lived as long as in lower density years, but many (55%) failed to successfully spawn, indicating a density-dependent process.

In Cook Inlet, relatively high abundances of Chinook salmon spawners during the mid-2000s contributed to decline in recruitment in subsequent years (Jones et al. 2020).

In the Yukon River, more than 45% of variability in juvenile Chinook salmon production has been associated with river temperatures and streamflow during parental spawning migrations (Howard and von Biela 2023). Twardek et al. 2022 noted increased egg retention by female Chinook salmon in the upper Yukon River that were not able to reach natal habitat due to an in-river barrier. This egg retention did not vary across years of different run sizes, suggesting it was not driven by density-dependent processes.

In the Columbia River basin, prespawn mortality of females was highly variable (0 – 65% across 14 years), but the probability of female prespawn mortality decreased across the spawning period. In this work, prespawn mortality was associated with both stream temperature and individual size, with larger fish experiencing greater prespawn mortality (Bowerman et al. 2021). Here, prespawn mortality is also predicted to increase with future climate warming.

In the Wenatchee, increased scour, as a function of streamflow, is likely to reduce the amount of returning spawners in the future by approximately ~15% (Honea et al. 2016); *Does overlap of spawning habitats create increase scour of Chinook redds (via sockeye arriving and their redd construction)?*

However, Westley (2020) noted that mortality of prespawn fish were slightly smaller than successful migrants for summer chum in the Koyukuk. Von Biela et al. (2021)... *to what extent do extreme run of sockeye coupled with environmental factors influence spawning success?*

- *What is the genetic makeup and/or stock structure of Chinook spawners in the Nushagak?*

Genetically, the sex-determining gene of Chinook salmon has been assigned to chromosome 17 (Phillips et al. 2013); recent work by McKinney et al. (2020; see Figure 1) has shown that western Alaska populations (e.g., the Togiak) have greater proportions of males assigned to the Ots17-MH1-haplogroup, associated with smaller fish and age-at-maturity (e.g., jacks), though this has not been mapped for the Nushagak specifically. In contrast, systems that have traditionally produced larger Chinook in Alaska (e.g., Yukon River, Cook Inlet) have greater proportions of Ots17-MH2 and Ots17-MH4-haplogroups, associated with larger fish.

For populations of Chinook in western Alaska, Siegel et al. (2018), found that second year marine growth has a disproportionate influence on age at maturity for both sexes, where males tended to grow more in length during this period. On the other hand, females possibly storing more energy toward gonad development. Interestingly, Manishin et al. (2021) found that shifted age structures for Chinook salmon could be attributed to concentrated mortality at coean age-3 (modeled as an additional 43% mortality at this age class) due to predation by marine apex predators (e.g., salmon sharks, killer whales). At this stage in their life, maturing Chinook become larger, and more selected by marine predators, than other available prey, primarily other Pacific salmon species (e.g., more numerous sockeye salmon). Taken together, in accordance with other recent work on late-stage ocean predation (see Seitz et al. 2019; Ohlberger et al. 2019), these non-fishing induced effects could, in part, explain shifts towards smaller Chinook males, and potentially, higher proportions of ‘jacks,’ returning to the Nushagak.

- *Can the effective number of breeders in a population for a specific spawning area (e.g., tributary) and/or genetic stock be determined (e.g., to census the total population size)? If so, could this information better inform escapement needs for specific Chinook populations within the Nushagak?* (see Yates et al. 2017).
- *Do sex ratios, age structure, and/or size-at-age of Chinook spawners differ between habitats?*

Hinch et al. (2021) reviewed 19 studies with 40 situations where female and male mortality could be directly compared in the Fraser River, British Columbia. This work focused on sockeye salmon, where the relative proportion of females on spawning grounds has declined in recent decades. Reported female mortality averaged 2.1 times that of males and was also evident for populations of Chinook salmon. Female mortality was higher when migration conditions were challenging (e.g., high temperatures, handling).

For a population of returning adult Chinook salmon in British Columbia, Bass et al. (2019) investigated the effects of simulated gillnet handling as well as the effects of infectious agents (e.g., a parasite, *Cryptobia salmositica*) on migration and survival. Gillnetted fish took longer to migrate than those biopsied for infectious agents alone, but there was no difference in survival or migratory success. However, in a holding portion of the experiment those without parasites survived longer than infected fish whether gillnetted or not. Notably, male Chinook were more 5.1 times more likely to reach the spawning grounds relative to females and migrated faster as well.

In the Naknek, Chinook mainstem spawners were more fecund than tributary spawners, a likely function of body size (Albert *in prep*).

Ohlbereger et al. (2020) quantified how long-term trends in declining female body size has reduced reproductive potential of female chinook 24 – 35% in the Yukon River since the 1970s.

**2) *How does sockeye adult density affect Chinook migration, and thereby, estimates of Chinook run size/escapement?***

Sockeye push Chinook off shore during migration, resulting in variable coverage of current counting methods (Maxwell et al. 2020); *during recent years of record sockeye runs (and increased over escapement), are Chinook returns increasingly underestimated?*

Togiak Chinook also exhibit extended holding and backing from freshwater to saltwater (Sethi and Tanner 2014).

- *What is the accuracy of post-season aerial surveys (e.g., spawning ground, carcasses...water clarity)?*
- *Does temporary tributary use by Chinook during migration affect counts? (e.g., Naughton et al. 2009)*
- *How accurate is species apportionment of visual/sonar counts with changing size structure of returning fish? Is a Chinook a Chinook (e.g., jack size vs. size of other adult salmon spp.?)*
- *Could eDNA techniques support indices (e.g., Levi et al. 2019)?*

**3) *To what extent do juvenile sockeye and Chinook compete for food and space?***

Because the approach of Brennan et al. (2019) is retrospective (e.g., obtaining otoliths from returning adults), conclusions cannot be drawn about habitats that were less productive in a given year owing to potential abiotic (e.g., streamflow, water temperature) or biotic (e.g., inter- and/or intraspecific competition, food availability) conditions. Largely, production of Chinook salmon and sockeye salmon do not correspond to similar habitats in a given year, however, different life histories exhibit different production patterns. Notably, sockeye salmon that spent <1 year in freshwater originated from riverine habitats, while sockeye that spent >1 year in freshwater were typically produced from lake habitats.



Moreover, habitats of natal production do not necessarily correspond to habitats of juvenile growth. As noted above, in 2011, more Chinook salmon were produced in the upper Nushagak, but total growth was more distributed throughout the Mulchatna River. Accordingly, in 2014, greater juvenile Chinook growth occurred in the lower Mulchatna (where sockeye production was relatively low) whereas, in 2015, freshwater age 0 sockeye production was relatively high in the Mulchatna overlapping with both Chinook production and growth.

Jump et al. (2019) describes vertical distribution of juvenile Chinook in the Tanana River in which species are spread and overlap throughout water column.

- *In years of high riverine sockeye production, is competition increased between Chinook parr and freshwater age 0 sockeye?*

Sockeye salmon in the Nushagak River historically have a larger proportion of riverine freshwater age 0 fish (Ohlberger et al. 2023). Ulaski et al. (2020) describes positive selection for fish migrating to sea in the first year of the life (freshwater age 0), in which “bigger is not always better.” For Chinook, increased juvenile growth rates tend to promote jack male life history (Berejikian et al. 2011).

- *What is the timing of smolt migration for sockeye and Chinook in the Nushagak? How does size of juveniles, mediated by density-dependence, affect this timing?*

Exploratory work proposed in Schwanke 2014; findings? (Contacted ADFG on 2/13 via email for internal summary... “There was not a formal report written since it was exploratory/feasibility work. I’m pretty sure I did a summary in a memorandum. I no longer have access to the Bristol Bay networks but Lee Borden, the Bristol Bay Sport Fish Division biologist might be able to find it.-----Craig”)

Wood River sockeye more protracted emigration period relative to Egegik (4.5 vs 27 days; Dailey 2020). Chignik River median emigration as early as May 24, Wood River as late as July 5; *does timing and length of Nushagak sockeye emigration result in greater competition (e.g., habitat overlap, food*

*availability) with juvenile Chinook...mainstem/riverine production? How does emigration compare for high numbers of freshwater age 0 sockeye to other juveniles?*

Age at smoltification decreased with increasing fry density for sockeye in Chilkat Lake (Neil 2018).

*What is the effect of large sockeye runs and juvenile abundances on productivity? (e.g., Wipfli et al. 1999)* E.g., transport of marine nutrients provided by spawners out of freshwater by freshwater age 0 in the Nushagak.

***4) How does potential intra- and interspecific competitive interactions affect juvenile growth, and thereby, early marine survival?***

Density-dependence described often for juvenile sockeye or Chinook alone (e.g., Rich et al. 2009; Perry 2012; Neil 2018). Brennan et al. (and others) suggests overlap in juvenile habitats. Juvenile sockeye entering marine environment in a year with high competition were on average 11% smaller and entered ocean earlier, but marine growth did not vary when accounting for size and entry timing differences (Freshwater et al. 2017).

Berkman et al. (2021) found smolt production of Chinook in Southeast Alaska was higher in years when parr were smaller, indicating density-dependent growth. Marine survival was positively related to smolt length. Further, first-year marine growth is positively related to return, productivity, and marine survival of Chinook in Southeast Alaska (Graham et al. 2019)

In the Salmon River system, growth of Juvenile chinook was associated with water temperature and density, with greater growth occurring at lower densities, negative growth effects at high density, with density-dependent functions intensified by warmer temperatures (Crozier et al. 2010).

Puget Sound chinook juvenile decline in survival with numerous pink salmon (Ruggerone and Goetz 2004).

Michel (2018) suggests marine mortality may not be as important to describe variability in cohort size for California Chinook (e.g., compared environmental factors such as stream flow)

### 5) *Can fisheries induces changes in years of variable abundance?*

Fish that are gillnet marked are assumed to have greater prespawn mortality, and may be higher than expected, but nonretention mortality may exert stabilizing, disruptive, or directional selection depending on size distribution (Baker and Schindler 2009; Baker et al. 2011)

Notably, in the Nushagak, while variable, commercial Chinook harvests are generally smaller-than-average fish (Kendall and Quinn 2011). In contrast, recreational, and likely subsistence, fisheries removed larger-than-average fish. As commercial fisheries harvest the majority of Chinook in the fishery (73%, 1981 – 2009), these results suggest that changes in size and age at maturity are not driven solely by fisheries selection. In the Kuskokwim, Chinook escapement for maximum sustained catch has likely increased over time, but depends on size-selective harvest (e.g., bigger meshes on large nets in Chinook directed harvest, less applicable to Nushagak? Staton et al. 2021)

Connors et al. (2020) describes that harvest policies that prioritize meeting minimum subsistence needs were unlikely to affect long-term sustainability of Chinook in the Kuskokwim. Further, evidence of populations diversity (see subquestions within Question 1 above) resulted in asymmetric trade-offs of fishery and conservation objectives where small changes in harvest results in relatively large increases in equitable access for subsistence.

A recent Alaska Department of Fish and Game report examined mortality of Chinook caught and released using sport tackle in the Nushagak River during 2017 – 2018 (Borden and Dye 2022). Annual

catch and release of sport fish Chinook is approximately 26,000 spawners (2011 – 2015). While it should be emphasized that this is a draft report (see also Dye and Borden 2018), results indicate relatively high survival in the short term (5-day pooled survival = 93.4%) similar to previous work on the Kenai River which determined apparent catch-and-release mortality of 8% (Bendock and Alexandersdottir 1993). Raby et al. (2013) found high survival for pink and chum salmon that were captured at spawning grounds (~5% mortality), but these fish had already reached spawning grounds prior to capture.

In the Nushagak study, which tracked post-release survival with radio tags, fifteen individuals (e.g., tags), out of 100 tracked during 2017 were located on apparent spawning grounds in August during postseason aerial surveys, up to 130 miles from where they were tagged. This was not a complete census of spawning grounds and covered a selection of spawning tributaries (see Figure 10; Borden and Dye 2022). While this information indicates at least some individuals were able to reach potential spawning grounds, the fate of 85% tagged individuals was unknown beyond the 5-day tracking period, and spawning success for the fifteen individuals is also not known (e.g., prespawn mortality once arriving to spawning grounds). Additionally, sex information for the fifteen individuals is not provided in the draft report. Overall, however, in 2017, 77% of tagged survivors were male while 21% were females (see Table 4).

- *Do delayed openings of commercial sockeye harvest allow greater proportions of males (potentially small males, jacks) to escape?*
- *Chinook entering river during short time windows likely headed to same spawning areas?*

DeFilippo et al. (2019) describes “cohort mismatches” in Frazer Lake, Alaska, where sockeye jacks from strong-year classes spawn among older males from weaker recruitments of previous year cohorts. This is amplified by size-selective harvest of larger males. Repeat occurrences can disrupt the stabilizing influence of frequency-dependent selection.

DeFilippo and Ohlberger (2021) further describes jack prevalence and cohort mismatching through stochastic recruitment. However, populations of Bristol Bay sockeye do not exhibit these traits due to large and diverse populations (e.g., ‘portfolio effects’ stabilize and dampen potential cohort mismatches); however, *how might this apply to Nushagak Chinook, especially given recent low returns and variable recruitment?*

Berejikian et al. (2010) experimentally describes mating success of jacks relative to mature males for hatchery-based Chinook salmon. In this work, for each trial, 16 total males were stocked into experimental spawning sections with six adult females (e.g., an approximately natural sex ratio). Of the 16 males, the number of jacks varied from 4 – 10 individuals. Overall, jacks and mature males mated with the same number of females but jacks sired only 20% of offspring. Mature males were almost always first to arrive on a nest with a spawning female, in part, explaining their mating success (e.g., sperm precedence). Overall, this work supports frequency-dependent selection, but as noted in DeFilippo and Ohlberger (2021), when jacks greatly outnumber mature males, the potential effects to the population can be stronger, and moreover, in a natural environment, smaller males often arrive on spawning grounds first.

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Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 11: Support With Amendments  
Proposal 12: Support  
Proposal 13: Oppose



**Submitted by:** Roger Brooks

**Community of Residence:** fairbanks

**Comment:** I am a passionate fisherman, its an outdoor activity that refreshes my spirit. i fish all over Alaska with my wife, and soon will entertain and teach my grand children responsibly.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Brandon Brooks

**Community of Residence:** Eagle River, AK

**Comment:** This was previously a great opportunity to get my two daughters interested in fishing at a young age and a way to stock up on fish. It's shameful that as Alaskan residents you would actively side with commercial fisherman, many from outside Alaska who only take from the state.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC61**

**Submitted by:** Clinton Brown

**Community of Residence:** Anchorage

**Comment:** Vote no on 163-167. The only people who will benefit are commercial fisherman who are financed by lower 48 processors. The fish belong to the people of Alaska, not lower 48 and foreign interest groups.

If I want to use a charter to dip net then that is my prerogative.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:

Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC62**

**Submitted by:** Elizabeth Brunswick

**Community of Residence:** Houston, Alaska

**Comment:** I work for AK-X on the Copper River seasonally, my job, and other people's jobs/careers are put at stake if we let these proposals come into motion. I feed my family with the fish I catch and lots of other people do the same. I've been dipnetting since I was 12 years old and it's my favorite way to fish, and to be able to make a career out of it and have a family at my workplace gives me so much happiness. The Copper River has done everything to keep the fish in steady counts, and healthy as is. I OPPOSE Proposals 163-167.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Hank Brunswick

**Community of Residence:** Houston, AK

**Comment:** My name is Hank, and I have been dipnetting 10+ years. I've dipnetted in the Copper River and the Kenai River, and even got my daughter into it so much she has created a career for herself. I fish for my family and to be able to eat comfortably throughout the year. I own 2 businesses and taking those away from me would bring my world down in pieces, just like it would for all the charters on the Kenai and Copper Rivers. These are people that not only support their families with fish, but with the money they need to survive. Many many jobs are created on the rivers to help keep the rivers maintained between cleanliness, fish counts, fish processing, camping, food/drink/hotel and so on. We cannot shut down dipnetting in our state, our economy can and will fall even more.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Greg Brush

**Community of Residence:** Soldotna

**Comment:** I dont dipnet. At all. So, I consider myself pretty objective, w no dog-in-the-fight. With that said, I oppose 163-167, as they simply serve to limit regular Alaskans and benefit another user group. I'm tired of this greedy "take and give"... enough. Please!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and

access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Richard Bucy



**PC65**

**Community of Residence:** Kenai, AK

**Comment:** I am 78 years old and have lived in Alaska most of my life. I was born in Juneau and have lived in Fairbanks, Utgiavik, Anchorage, Soldotna and Kenai. My wife and I have fished regularly and enjoy smoked, grilled or baked Salmon on a regular basis. Dip netting is a major source of those Salmon.

I OPPOSE Proposals 163-167. Their seems to be a belief among commercial fishermen that the fish belong to them and any we citizens who sport or subsistence fish catch are directly pulling money out of their pockets. It is a shared resource.

These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten my rights as an Alaskan and are the first step towards unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder and creates an unnecessary burden on those fishing as does Proposal 167 which only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:





**Submitted by:** Brianna Burgy

**Community of Residence:** Wasilla, Ak

**Comment:** I'm Alaska native and grew up catching fish for our food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** David Burlingame

**Community of Residence:** Anchorage

**Comment:** I am a 42-year resident of Alaska. I have watched the personal use and sportfishing rights of all Alaskans take a second seat to commercial interest, including the interests of many fisherman that are non-residents for many years. The economic impact of sport fishing in particular is the lifeline to many businesses and people throughout Alaska and should always be placed at a higher priority than other special interest groups. Sport fisherman represent all manner of alaskans, not just the small percentage of Alaksans that take the majority of fish.



I OPPOSE Proposals 163-167. These five proposals represent only a very small percentage of users within the Prince William Sound and Cook Inlet, many of which are non-residents to the State of Ak. Rules and regulations should benefit the residents of our state first and foremost and be for all Alaskans. Commerical fisherman who are also residents of the State should receive a preference over those that are non-residents, but their preference whould not supercede other state residents.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC68**

**Submitted by:** James Burton

**Community of Residence:** Anchorage, AK

**Comment:** Madam Chair and members of the board,

Please support proposals 157 and 158.

Many people harvest fish resources from different platforms in different areas of the State and it seems archaic at best, to limit a commercial salmon fisherman to one salmon net area per year. These proposals are good for the State's economy, great for the fishermen and their crew, and with the number of latent salmon permits in Alaska would be a win-win all the way around.

I would like to take it a step further and eliminate 5 AAC 39.120(c)(3-4) and abolish essentially what amounts to superexclusive registration for salmon net areas on one vessel. There are latent permits in every salmon seine fishery. There are stacking, buyback or other consolidation measures that continue to come before you or buyback programs executed via federal loans. Because of the word limit, I'll expand more on this later, but why not put this in the hands of the fishermen instead of public dollars?

Thank you,

James Burton

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<b>Proposal 11:</b>	<b>Proposal 87:</b>	<b>Proposal 156:</b>
<b>Proposal 12:</b>	<b>Proposal 153:</b>	<b>Proposal 157:</b> Support
<b>Proposal 13:</b>	<b>Proposal 154:</b>	<b>Proposal 158:</b> Support
<b>Proposal 82:</b>	<b>Proposal 155:</b>	<b>Proposal 159:</b>

Proposal 160:  
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Proposal 162:  
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Proposal 165:  
Proposal 166:  
Proposal 167:

Proposal 168:  
Proposal 169:



**PC69**

**Submitted by:** Ryan Butler

**Community of Residence:** Anchorage, AK

**Comment:** I STRONGLY OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Proposing additional hurdles and prohibiting safe access is unnecessary and absolutely unconscionable.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC70**

**Submitted by:** Carmen Bydalek

**Community of Residence:** Anchorage

**Comment:** Fish is part of the Alaskan experience.

The true problem is commercial overfishing, bottom trawling and other industrial types of fishing.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**PC71**

**Submitted by:** Chris Bye

**Community of Residence:** Fairbanks, AK

**Comment:** My family and I use copper river salmon to offset high food cost. My boat is not copper river worthy as it is significantly under powered for such a high flow.

I OPPOSE Proposals 163-167. These five proposals appear to be an attempt by the commercial industry to use the state as a bludgeon preventing typical Alaskans the opportunity to harvest fish for their own consumption. No doubt, the commercial industry is eyeing a desire to increase a local market initiative by excluding access to harvest needs. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
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Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Raymond Cain

**Community of Residence:** Fairbanks, Alaska

**Comment:** I am against all of the ridiculous proposals. The commercial fishermen want all the fish and they are happy. To sell you some. I am a 53 year resident with over 30 years dipneting and operating a fish wheel at chitina I supply fish for many elders in this community and about 10 other family's that use the fish wheel nothing is waisted and we keep the area clean. Thanks

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Tiffney Carlson

**Community of Residence:** Kenai alaska

**Comment:** Hello,

I am a born and raised Alaskan. My family and I fish and hunt often. We rely a lot on the food we process and eat throughout the year. We smoke, can, and freeze most of our catches. We do this process as a family and with any friend or our children's friends who want to participate and learn.

Trusting where the food comes from and how to properly process the food for best quality is important to us.

We have influenced a lot of the younger generation children to become active hunters and fishermen in our community. It is not only a tradition, a family event it gets us all out and learn to live off the land just how God intended. It helps reduce the costs in an ever so expensive economy and time of life. Please don't put more restrictions on what Alaskan's need to survive.

We fish all over the state but mostly on the kenai peninsula . Lake, river, and ocean fishing.

Guides need jobs too !

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Paul Carlson

**Community of Residence:** Kenai

**Comment:** I live and fish on the Kenai Peninsula. I use the personal use dipnet fishery to feed my family. I strongly oppose the selfish proposals by the commercial fishermen. They take undress of thousands of fish. I take 55. The Alaska Constitution clearly addresses the use of resources FOR ALL ALASKANS, not just the commercial fishermen.



**PC74**

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Aaron Carmack

**Community of Residence:** Eagle River, AK

**Comment:** Each year I take a trip down to Chitina to dipnet with Rockskipadventures and Ryan Ford. I do all the processing on-site and have great success every year to be able to feed our family of four the entire year with canned, smoked, and/or grilled salmon. Without charters I would have to take several trips, fight elbow-to-elbow, expensive dipnetting at Kenai, and end up with spoiled and/or sandy fillets.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



**PC75**

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC76**

**Submitted by:** Kortnee Carmack

**Community of Residence:** Eagle River

**Comment:** We rely on Chitina dipnetting with Rock Skip Adventures for our year's worth of salmon which we eat at least once per week. Without this charter we would not be able to harvest enough salmon to last us even a few months.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC77**

**Submitted by:** Eric Carpenter



**Community of Residence:** Anchorage Alaska

**Comment:** Prop 165.

Subsistence fishing was never meant to be a commercial enterprise.

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**Proposal 153:**  
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**Proposal 156:**  
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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Support

**Proposal 164:** Support  
**Proposal 165:** Support  
**Proposal 166:**  
**Proposal 167:**  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Dennis Casagrande



**PC78**

**Community of Residence:** Anchorage Alaska

**Comment:** Proposal 163 prohibiting "guiding" in personal use fin fish fisheries: **STRONGLY OPPOSE**

Mr. McCormick states that the industry of guiding in personal use fisheries is growing rapidly, which is not the case. Speaking on behalf of the Copper River there are the same charters that have been running for years, with the newest established in 2018. These operators are not in the business of selling fish ex vessel, and the comparisons made are not applicable at all as the Commercial sector in Cordova operates on an entirely different business model. This proposal compares the personal use operators to the "commercial fishermen", which isn't fair or true. The harvest in the personal use is a fraction of the take of the commercial operators out of Cordova. Personal use operators are selling an opportunity for the clients to safely fish aboard USCG licensed captains vessels on the river, to catch the fish they are allotted by the state. The Copper River is not a good place for inexperienced boaters, and eliminating professionals on the river is a huge public safety concern. The businesses operating in the personal use fishery are selling safe access for Alaskan residents to participate in the fishery under the guidelines set forth by the Alaska Department of Fish and Game, and are not paid by the pound but rather by the participant. This proposal is not based on science, is not aimed to benefit the run as a whole, and is purely based on entitlements of a public resource.

**Proposal 164 registration and reporting requirements: STRONGLY OPPOSE**

This proposal is redundant. ADFG already collects in-season data from the sonar, and has an established permit reporting system for all participants in the fishery. The customers of charter operators in the personal use fishery all fill out their harvest records prior to leaving the fishing grounds. The data sent in to ADFG from the clients of the charters is highly accurate, and it is in the best interest of the charters to operate under the full letter of the law. Repeating the same fish harvest report to ADFG is not only useless but would cost the department to process the redundant data.

**Proposal 165 prohibit compensation for subsistence guiding: STRONGLY OPPOSE**

Subsistence access should not be limited, but rather encouraged. Recently, many people from the AYK drainage have travelled to new areas, being that their state and federal subsistence opportunities have been limited. Access to these new areas is limited to local knowledge, and further reducing access for these people is NOT the answer, particularly when there's no biological reason for such.

**Proposal 166- Establishing a statewide limit for personal use fin fish: STRONGLY OPPOSE**

While this would encourage people to use every possible bit of the fish they harvest it would be massively confusing for people and an enforcement nightmare.

Proposal 167- Requiring reporting of personal use caught fish within 5 days: **STRONGLY OPPOSE**

Another redundant proposal. There are already methods that provide real time data giving ADFG the information needed to use their EO authority to close fisheries when the security of the resource demands it. ADFG has stated that this is repetitive and would only serve to cost the department money and resources spent on data collection they do not need.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**PC79**

**Submitted by:** Daniel Case

**Community of Residence:** Glennallen, AK

**Comment:** Subsistence fishing is a critical source of food for Alaskan residents. Curtailing resident subsistence fishing for reasons other than run failures should not occur

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** George Casey

**Community of Residence:** Ninilchik

**Comment:** I'm in Ninilchik rely on my salmon to eat

I oppose this proposal

Stop the trawlers

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Michael Cashman

**Community of Residence:** Palmer

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Nancy Castle

**Community of Residence:** Fairbanks

**Comment:** As a 40 year resident of Alaska, I rely on the fish we get from Chitina and sometimes from the Kenai.

Fishing for my family should be a propriety over commercial fishermen.

This board should be helping the people of Alaska who count on our salmon.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

I OPPOSE Proposals 163-167. These proposals tend to favor the commercial fisheries and as I see it they have overfished our waters Long enough. And now they want to restrict the personal use fishing. You, the people on the board of fisheries should be the champions of the Alaska people and people who count on personal use



**PC82**

fishing to sustain their way of life. Personal use fishing should ALWAYS take priority over the Commercial fishing.

NO ON 163

NO ON 164

NO ON 165

NO ON 166

NO ON 167

Thank you for your time.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Firen Changwiegele



**PC83**

**Community of Residence:** Anchorage, Alaska

**Comment:** I go dip netting to feed my family. I usually fish at Kasilof and the copper river. I go fishing with my family, we've been doing it for generations.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose  
**Proposal 164:** Oppose  
**Proposal 165:** Oppose



**Submitted by:** Christopher Chiei

**Community of Residence:** Anchorage

**Comment:** To whom it may concern:

I have been a resident of Alaska for 28 years and have enjoyed access to subsistence fisheries annually. I spent many years dipnetting from the beach at the mouth of the Kenai and Kasilof River but eventually stopped doing that because of the crowds and what I saw as negative environmental impact to those beaches during dip net season.

I later welcomed the opportunity to harvest our fish from a guided boat. This has provided a greater level of comfort and safety and all-around fun way to engage our watershed and fill our freezer.

We have dipnetted this way with the same guide service (The Dip Ship) for the past five years. We have always seen them to hold to the highest level of safety standards and know them to be unwavering in compliance with all regulations.

In particular, we appreciate that they take the time to teach us about the different types of salmon, the fish life cycle, and fillet techniques.

I also appreciate that these guided services provide access to people with limited mobility where beach access is almost entirely inaccessible.

I urge you to maintain this valuable guiding option as it currently is so that Alaskans will continue to have a safe and environmentally sensitive way to access subsistence fishing.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskans' rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 156:**  
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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose  
**Proposal 164:** Oppose  
**Proposal 165:** Oppose

**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



# The Chitina Dipnetters Association

## Public Comments Concerning Submitted Proposals To The March 10-13, 2023 Alaska Statewide Board of Fisheries Meeting.

### **Prop. 163—oppose**

Prohibit Guiding in Personal Use finfish fisheries.

Alaska P.U. dipnet fisheries are Alaska resident only fisheries.

The Copper River is very dangerous and access for dipnetting within the Chitina Sub-district is limited and requires, most times, a boat or ATV. Many do not possess these means to access the Chitina P.U. fishery and guides/charters are their preferred means to successfully harvest some salmon. To eliminate guides in the P.U. finfish fisheries would add new restrictions on Alaska resident dipnetters and their ability to supplement their families annual food supply.

### **Prop. 164--oppose**

Establish registration and reporting requirements for personal use guides and transporters.

Registration for guides would only raise the cost of a P.U. dipnetting trip for those Alaska residents that use their services. Also, guide mandatory reporting of all fish harvested and total fishing effort would just be redundant, as this info is already reported on each individual dipnetters P.U. harvest permit. If that individual does not submit his harvest report he will be ineligible to receive a permit the following year. F&G has lately been very strict on this penalty and creates a good incentive for reporting.

### **Prop. 166—oppose**

Establish a statewide bag limit for personal use finfish fisheries

At the 2012 Copper River/Prince William Sound BOF meeting in Cordova, the board changed the Chitina P.U. annual bag limit to match the Kenai area personal use finfish fisheries. A annual limit of 25 salmon for the permit holder plus 10 fish for each additional household member was passed. This passage based the annual P.U. finfish dipnet limit on the size of ones family, the larger the family the more fish allowed, and is





a very far way of determining bag. The Chitina Dipnetters Assn. does not want to see this changed.

**Prop. 167--oppose**

Require in-season reporting of subsistence and personal use salmon harvest within 5 days of harvest.

Similar proposals have appeared in at least the last 3 BOF meetings dealing with Copper River finfish and were opposed in all. The Alaska F&G Dept. consistently opposed these proposals on the premise that it would place undue burden on P.U. dipnetters. Also, since the management of the Chitina P.U. dipnet fishery is based on actual sonar counts and the in-river goal of upriver migrating salmon, F&G stated that any in-season harvest reporting is not needed to manage the fishery.

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Proposal 163: Oppose

Proposal 164: Oppose

Proposal 166: Oppose

Proposal 167: Oppose

**PC86**

**Submitted by:** Grant Christopher

**Community of Residence:** Kenai ak

**Comment:** No proxy for silvers. Change limit from 3 To 2 for Silvers in September. Have fished here for 42 years. We will lose our Silvers next. ThNk you

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**PC87**

**Submitted by:** Andy Cizek

**Community of Residence:** Soldotna alaska

**Comment:** Regardless of how people want to twist things and whine and complain that they're getting the short end of the stick these fish in alaska is a resource of the people of the state of alaska and not only for a select few greedy people who have a measly permit stating they're a commercial fisherman. They're just another special interest group that already gets unfair treatment already through all the covid bs as well as many other years of getting government payoffs when they didn't catch enough fish. This resource belongs to us the people of alaska therefore we the people of alaska should get first choice and the first chance to fill our freezers no matter if they decide to hire a guide to help with that or not even before the fishing is opened for the commercial fishermen to start. If commercial fishermen have their way we the people of alaska who own this resource will be forced to pay \$20/pound for fish at the stores and who can afford that? Hence no matter how many people of alaska who want to fill their freezers and no matter how they choose to do it that should be allowed first. We also need multiple times more wild salmon escapement goals so the hatcheries aren't needed because they only diminish the dna and overall health and survivability of our natural wild salmon stock. So if you plan to limit

anything limit the special interest group from taking way more then their share yet whining and complaining every step of the way. Thank you for listening.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Kelley Cizek

**Community of Residence:** Soldotna, Alaska

**Comment:** Our family depends on the fish we catch during dip net season. It is what we eat all winter and is a large part of our diet. We do not have the resources to buy fish and a decrease in the amount we can harvest would harm our ability to sustain our ability to feed our family within our means.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.



**PC88**

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
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**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Robert Clucas



**PC89**

**Community of Residence:** Kenai

**Comment:** I was born & raised on the Kenai Peninsula. I grew up Commercial, Subsistence & Sports fishing I Support Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 help protect rights of Alaskas fish and are a big step regulating access by non residents to a local food resource. Proposal 164 helps confirm the harvest data reported post-season by the permit holder, Proposal 167 only creates a better reporting system Finally, Proposal 166 would create a statewide bag limit which helps to chip away at the extremely unhealthy flow of salmon from Alaska to non residents

I strongly SUPPORT Proposals 163-167 and ask the Board of Fisheries to VOTE YES on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 11:**  
**Proposal 12:**  
**Proposal 13:**  
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**Proposal 87:**  
**Proposal 153:**  
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**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Support

**Proposal 164:** Support  
**Proposal 165:** Support  
**Proposal 166:** Support  
**Proposal 167:** Support  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Sam Coffman

**Community of Residence:** Fairbanks, AK

**Comment:** I am a Fairbanks resident that tries to dipnet every year. I usually go with either my girlfriend or friends and we fish from shore. We all rely on the fish that we catch for a portion of our food security for the winter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** William Cohen

**Community of Residence:** Soldotna

**Comment:** I am a life long Alaskan. Born here in 1956 & will be an Alaskan resident until the day I die. Many commercial fishermen take the money they make from our resources and live & spend it somewhere else. As a lifelong sport & personal use fisherman I don't want any more constraints on my ability to access any non-commercial fishing activity.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Betty Come

**Community of Residence:** Chugiak,Ak

**Comment:** This feeds our family.Pl's don't take this away from us Alaska

COMMERCIAL FISHING JUST KEEPS GETTING RICHER AND RICHER OFF THE FISH THEY DONT CARE ABOUT OUR FAMILY WHO NEED THIS.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Michael Conner

**Community of Residence:** Eagle River

**Comment:** I am a disabled veteran, and I subsistence fish for myself and other disabled veterans in Chitina, and I fish with other disabled veterans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Andrea Cook

**Community of Residence:** Fairbanks, AK

**Comment:** I fish with my husband and kids to help supplement our food supply. With the population of moose and caribou dwindling as well as salmon I worry about my families long term food security. With the amount of people who live in Alaska and rely on hunting and fishing to survive we should come first not a fishery trying to sell our food for profit.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



**PC94**

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of

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**Proposal 153:**  
**Proposal 154:**  
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**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**





Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 999811

February 3, 2023

Re: 2023 Statewide Finfish Meeting  
Comments for Proposals

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

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. Since 1935, CDFU has represented fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region. As you deliberate on proposals, we respectfully ask you to consider our comments:

**Proposal 153 - SUPPORT**

**5 AAC 39.145. Escape mechanism for shellfish and bottomfish pots.**

We support this proposal submitted by Alaska Wildlife Troopers to clarify language on how escape mechanisms are rigged in collapsible style pots. Aligning regulatory language across enforcement agencies will reduce user confusion and ensure that sablefish fishermen in our region and beyond will be in compliance.

**Proposal 154 - OPPOSE**

**5 AAC 39.155. Seine drums unlawful.**

*Allow the use of purse seine drums as follows:*

We oppose this because the fleet of the Prince William Sound region is efficient and sustainable as it is. Using a drum for seining allows boats to have one less crew member. Additionally, we oppose the proposal due to the removal of the regulatory



language allowing the use of a reel mounted on a seine skiff. Some PWS seiners use a skiff mounted reel to set their lead. The consequences of removing this law would make this illegal.

### **Proposal 156 - SUPPORT**

#### **5 AAC 77.010. Methods, means, and general restrictions.**

*Prohibit the use of felt soled wading footwear while personal use fishing in freshwater, as follows:*

We support this proposal to amend language prohibiting the use of absorbent felt or fiber material on footwear soles. Fishermen of any fishery should be wearing the most appropriate footwear. We can't see any reason why felt footwear would be employed when fishing, but applaud it being banned. It's important to have enforceable protections to our freshwater systems. We support this proposal bringing the ban on potentially harmful transfer methods for invasive species into statewide regulation. This has been in regulation in the sport fisheries since 2010.

### **Proposal 159 - OPPOSE**

#### **5 AAC 39.XXX. New Section.**

*Close commercial fishing for a given species within one-fourth of a mile of any area closed to sport fishing for that species.*

We oppose this proposal that would close commercial fishing for any given species in nearby areas to sport fishing closures. Commercial fish biologists have the expertise and ability to discern regulatory waters. They do not need to be micromanaged to make the best decisions about the resources they manage.

### **Proposal 160- OPPOSE**

#### **5 AAC 39.XXX. New Section.**

*Require surrender of proceeds gained from sale of wild king salmon caught in hatchery terminal harvest areas.*

We oppose this proposal for the same logic as made us oppose proposal 159. ADF&G biologists and natural resource managers are able to make the best decisions about the



species and they manage this in real time. It does not make sense to penalize commercial fishermen operating on the cleanup openers described in the proposal.

### **Proposal 161- SUPPORT**

#### **5 AAC 28.XXX. New Section.**

*Create and establish Alaska Board of Fisheries policy regarding the management of groundfish fishery resources in waters of Alaska.*

We support sustainable, State management of our Groundfish resources.

### **Proposal 163- SUPPORT**

#### **5 AAC 77.XXX. New Section.**

*Prohibit guiding in personal use finfish fisheries.*

We strongly support this proposal that would prohibit guiding in personal use finfish fisheries. We do not support the commercialization of the personal use fishery, which is intended to extend a subsistence lifestyle to all Alaskans. The ban on guiding is already in place in the subsistence fishery on the Copper River.

### **Proposal 164- SUPPORT**

#### **5 AAC 77.XXX. New Section.**

*Establish registration and reporting requirements for personal use guides and transporters.*

We support this proposal requiring personal use guides and transporters to be registered similarly to sport fishing guides because it brings management and enforcement into alignment for saltwater and freshwater guides. This proposal addresses better regulation and management through reporting retained finfish catch. We know this is critical for us to have ADFG understand best through data what is happening in our fishery. Currently reporting is only required by salt water guides, as freshwater logbooks were no longer required as of 5/26/2019. There should not be a difference between how guiding is regulated.

### **Proposal 165- SUPPORT**

#### **5 AAC 01.XXX. New Section.**

*Prohibit compensation for guide services in subsistence fisheries.*



This proposal would just align with the recently adopted regulation that prohibits guiding in the Glennallen Subdistrict for subsistence fish. There has been precedent set via the subsistence Kodiak Fisheries, Fish Wheel Fisheries on the Copper River and recently in Glennallen Subdistrict of the Copper River. It would ensure that there would be no re-commercialization of fisheries throughout the state. We strongly support this proposal to regulate payments for guiding services in subsistence fisheries. Currently there is precedent set for this in the Copper River subsistence fishery and in Kodiak.

#### **Proposal 166- SUPPORT**

##### **5 AAC 75.015. Personal use fishing permits and reports and display of personal use fish.**

*Establish a statewide bag limit for personal use finfish fisheries.*

We support this proposal for a statewide bag limit for all personal use fisheries. This would mimic regulation that has been in effect for game management ensuring that there is a maximum number of species a permit may take statewide, and one can't zero out and roll over within a new region. The proposal would define what the limit would be per permit in the dip net fisheries so we ensure the long term sustainability of the personal use fisheries. Referencing 5AAC.01.645 bag limits have been defined under Subsistence Fisheries in the Copper River Fisheries. This would just be some housekeeping to align regulations with the precedent set in game management and subsistence fisheries.

#### **Proposal 167- SUPPORT**

##### **5 AAC 01.015. Subsistence fishing permits and reports, and 5 ACC 77.015. Personal use fishing permits and reports and display of personal use fish.**

*Require inseason reporting of subsistence and personal use salmon harvest within 5 days of harvest.*

CDFU put forward this proposal and we remain strongly in support. This would require in-season reporting of subsistence and personal use salmon within five days of harvest using an online app or a phone call to ADFG. Passing this would ensure real time data for managers to make informed, responsible decisions including those that would impose EO authority when our precious resource demands it. At the 2021 Prince William BOF there was a similar proposal proposed, this proposal is reworked under what the Board advised during that meeting.



### **Proposal 168- OPPOSE**

#### **5 AAC 75.003. Emergency order authority.**

*Extend emergency order authority to allow restrictions of sport fisheries in contaminated waters.*

This proposal would potentially lead to putting more pressure on wild stocks via catch and release when stocked fish are the intended targeted species. We don't want to see stocked fishes spreading disease to wild fish, or the idea that infected wild fish is then allowing more opportunity on wild fish.

Thank you for your time and consideration of our comments. We greatly appreciate the attention to the time-sensitive issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our proposal comments, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Jess Rude". The signature is written in a cursive, flowing style.

Jess Rude  
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 153: Support  
Proposal 154: Oppose  
Proposal 156: Support  
Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161: Support  
Proposal 164: Support  
Proposal 165: Support  
Proposal 166: Support  
Proposal 167: Support  
Proposal 168: Oppose



**Submitted by:** Brittany Couvillion

**Community of Residence:** Jber, AK

**Comment:** I was raised here in Alaska and dipnetting was a way for us to have food for the winter and through the year. It also let us experience netting as a family and the teamwork it took to pull fish into the boat. We lived in Nikiski for a long time and we would and still do dipnet from the mouth of the Kenai river. In a state that already costs a lot to live in people need to be able to catch what they need from the rivers. Commercial fishermen have no right to take away from the residents of Alaska. This is our land, not just theirs.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:  
Proposal 82:  
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Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kim Cresap

**Community of Residence:** Anchorage

**Comment:** I am a forty plus year resident of Alaska and support proposals 163-167.

This is the 21st century and nobody struggles with food insecurity in this day and age. The majority of people that participate in this aren't starving. It costs way more to travel, equip and harvest subsistence/ personal use fish than to just take that money and buy food. Nobody is taking an opportunity away to stock a freezer and then throw the freezer burnt fish away before the next season. As you know is a more common and wasteful use of Alaska's resources.

I strongly support Proposals 163-167 and ask the Board of Fisheries to VOTE YES on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**PC98**

**Submitted by:** Bernard Culbertson

**Community of Residence:** Valdez

**Comment:** I oppose proposal's 154, 157, 158, 159.

I urge the Board to Reject these proposals.

154 will give an advantage to larger vessels and PWS has a history of smaller vessels.

157 & 158 are ways to work around established means of controlling the number of vessels fishing a fishing district. We don't need more vessels.

159 would take a tool in fisheries management away from the Department.

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Proposal 12:	Proposal 157: Oppose	Proposal 165:
Proposal 13:	Proposal 158: Oppose	Proposal 166:
Proposal 82:	Proposal 159: Oppose	Proposal 167:
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154: Oppose	Proposal 162:	
Proposal 155:	Proposal 163:	



**PC99**

**Submitted by:** Robin Cunningham

**Community of Residence:** Wasilla, AK

**Comment:** I grew up in Kodiak Island and fishing has always been a part of my life. I have participated both as an individual and commercial fisher. I understand the balance of maintaining a fishery and protecting our waters; however subsistence fishing isn't going to cure the problem - there are much bigger issues - and taking away from our ability to feed our families is not Alaskan at all. I follow regulations and use my fish to feed myself. I don't take more than I need. We can do better than the suggested proposal.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.



The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Nicholas Czarnecki



**Community of Residence:** Fairbanks, AK

**Comment:** I am an Alaska resident and I rely on the personal use fisheries to help feed my family. These fisheries provide Alaska residents access to a sustainable, healthy, and local food resource, something that is quite rare in Alaska. I have dip netted the below the bridge personal use section of the Copper River for multiple seasons. Living in Fairbanks I lack the local knowledge and specialized equipment to safely dip net this section of the Copper River, and relying on a guide service is my only option to access this resource.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**



Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Cherlynn Dahmann

**Community of Residence:** ANCHORAGE

**Comment:** I have been a resident of Alaska for 28 years and have watched how the commercial fishing industry has made it more difficult for us to harvest fish by any means. If it were up to them we'd have to buy per # at the grocery store. There should be fewer commercial opportunities and allow us better chance to harvest what is ours.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Scott Daletas

**Community of Residence:** Soldotna

**Comment:** I live in Soldotna and I'm on the Kenai Soldotna AC Board and run a local small fishing guide outfit on the Kenai. I'm embarrassed a local Alaskan would write such a proposal and take opportunity away from Alaskans. These proposals are written because commercial fisherman believes all fish are their fish. I ask you to look at State managed hatcheries and ask yourself do all Alaskans help pay for this? The answer is, yes. Everyone has an equal opportunity to feed their family and start a business to help Alaskans achieve this. As our AC board shot all 5 of these proposals down I expect the same from the board.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** Keith David



**Community of Residence:** Anchorage

**Comment:** Thank you in advance for OPPOSING Proposals 163, 164, 165, 166, & 167. I have fished from the shore for most of my life but my disabilities make that impossible now. I have for the past 10 years been chartering with AK Expeditions and I have had consistent and safe access to harvest fish in both the Subsistence and Personal Use Fisheries I would no have otherwise.

Thank you for considering me and my families needs to access our fisheries.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** Jenny Davis



**Community of Residence:** Kenai, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans

opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose portions of Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them and consider the additional comments provided. Fisheries management is a contentious topic but is also unmanageable if different areas are all lumped together, i.e., the Kenai River and Copper River cannot be managed the same - different fisheries with different escapements.

People with access issues/challenges have the ability to proxy their household limit - a guide is not a valid option. But I stand by my comment that ALL guides should be Alaska residents in order to participate in ANY fishery.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Erik Dawson

**Community of Residence:** Anchorage, AK

**Comment:** I personally fish the Copper each year with family and feed my extended family for the year with our catch. This is a vital fishery and important to our way of life. The commercial crews that run the river are our eyes and ears. They share valuable knowledge about the ever changing conditions and fishing. Please do not allow this proposal to proceed.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.



I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** Lindsay Delevante



**Community of Residence:** Anchorage,ak

**Comment:** Born and raised Alaskan, I have fished all of my life. I fish for the food and to learn a skill that will help provide food for my family. I have gone fishing with my family since I was 5 years old. I fish out of Homer, Ninilchik, kenai and kasilof river and seward. We have been dip netting from the Kenai and kasilof rivers all of my life.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Paul Delys

**Community of Residence:** Fairbanks, AK

**Comment:** It seems like we've been through much of this before on proposals 163-167. I made almost my entire living in the commercial salmon fishing industry from 1976 through 1984. I have participated in the Chitina and Kenai Peninsula personal use fisheries for over 30 years, primarily on my own.

Regarding mentions of reporting catch within a few days of fishing in Proposals 164 & 167, whether fishing personally or guided, ADF&G has said over the years that they base fishery management on in-river sonar counts and in-season reporting won't contribute to their management models. Requiring catch reporting before the end of the season is a hassle for everyone and adds nothing to fishery management.

Eliminating guiding for personal use or subsistence fisheries, Proposals 163 & 165, will cut a lot of Alaskan families with neither the expensive equipment nor the experience to safely access the fisheries from participation. Since the east bank of the Copper River PU fishery is inaccessible without a boat, as are most of the subsistence waters, some people with money and inappropriate experience will surely perish on the rivers if either of these proposals is accepted.

Proposal 166: I'd question how many families "over"-utilize both the Kenai and Copper River personal use fisheries before emplacing statewide bag limits. Demonstrate a problem with fish being wasted or used out of compliance or against the spirit of the regulations before placing bans.

In short, these proposals strike me as attempts to make personal use and subsistence fisheries increasingly difficult to participate in, with the goal that Alaskans find shopping for salmon at the grocery store a more rewarding experience than partaking of our State's abundance. This attitude isn't aligned with the State Constitution, Articles 8 § 2&3, promising the People reasonable access to fishery resources.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Damien Delzer

**Community of Residence:** Fairbanks, AK

**Comment:** I always fish Chitina to get healthy protein for myself and my kids and grandchild. There is no way to be able to acquire such a valuable protein with the astronomical price increases to purchase retail with the current national administrations drive to inflate prices. Commercial interests can continue to profit from the wealthy interests from Seattle and California but the families who live and work in Alaska simply cannot compete with these outside interests driving up the retail price of healthy non-processed food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Janet Demientieff



**Community of Residence:** Fairbanks

**Comment:** Me and my family go to kenai area to fish we all live in the interior but since commercial fishing at the mouth of yukon has all but killed any fish for residents below now we have to go where we can to get fish. NO to commercial fishing when I was there boats with long lines literally taking tons of fish and sending to Japan while we residents get hours to fish in between NO think about Alaskan people for once.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Tiffany Derenzy

**Community of Residence:** Palmer, AK

**Comment:** I fish the Copper River with AK eXpeditions. The reason I choose a guide is because the river is incredibly dangerous and it is safer for myself and family to dip from a boat with someone who knows the river. The alternatives are unsafe and not reasonable. I will never go on that river with someone that doesn't know the river as well as the guide and hanging off the cliffs in which people die shouldn't be the only access to that fishery. The fishery is open to Alaskans and as an Alaskan I have the right to safely harvest fish. The commercial fishermen have always been and will always be greedy. The most sustainable way to fish is to not allow commercial fishing. I understand money drives this, however, when our fisheries are depleted and no one is making money and Alaskans cannot feed their families what will ADF&G have to say then.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
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Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Neil DeWitt

**Community of Residence:** Chugiak

**Comment:** I had to quit fishing because decision you all made not allowing fish to come to the Mat-Su borough anylonger. I can't afford to go hundreds of miles to catch a fish or two. I used to be able to fish in my back yard. I haven't had fish in my area for over 10 years now. Commercial fishermen say you can buy fish from me. I say it's time for me to go fishing again and your job to put fish back into the rivers, creeks, and streams in my area again.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 156:	Proposal 163: Oppose
Proposal 13:	Proposal 157:	Proposal 164: Oppose
Proposal 82:	Proposal 158:	Proposal 165: Oppose
Proposal 87:	Proposal 159:	Proposal 166: Oppose
Proposal 153:	Proposal 160:	Proposal 167: Oppose
Proposal 154:	Proposal 161:	Proposal 168:



**Submitted by:** Donald Dickey

**Community of Residence:** Anchorage Ak

**Comment:** I appose proposal numbers, 163,164,165,166, 167

As I believe, access and use of resources on state land, should be allowed for all residents of the state of Alaska, regardless of their race or financial position .

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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Keith Dienstl

**Community of Residence:** Anchorage, Ak

**Comment:** Oppose 163-167..This dip-netting is a right and resource of the people. Taking that away appears to be a political and money driven decision that is not in the best interest of the people of Alaska. I had trust this board would make decisions that benefited the majority of Alaskans..

I am an avid outdoorsman's and often fish with family and friends. Definitely use a guide while fishing the Copper River for a safer, more comfortable, and enjoyable experience.. We fish for enjoyment and to much food on our table..

I have a small family in Alaska that enjoys spending time in the great outdoors fishing. It is a treasured pastime for us. We always take a family trip each year to the beautiful Copper River Basin to enjoy the opportunity to harvest some Red salmon..

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Kimberly Dienstl

**Community of Residence:** Anchorage

**Comment:** We fish because we want to feed our family. We use a charter to do it safely and efficiently because they know what they are doing and we don't waste our time or time away from work to feed our family. We oppose a restriction to this option because we should have the right to chose someone that can help us do this safely. We are dealing with a very dangerous river and anyone suggesting the restriction of this should be fined themselves.

We fish with AK Expeditions and have been for years and taking away this right would be malicious intent.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jed Dilworth

**Community of Residence:** Anchorage, AK

**Comment:** I am an Army Veteran, that loves everything about the state of Alaska including the opportunity it provides to provide food on my table from its great abundance of wildlife. Fish and the ability to fill my freezer with fresh fish is a big part of how I provide for myself and my family. These proposals will severely hamper my ability to acquire the much needed source of food for me to live. Subsistence fishing is necessity for so many Alaskans it has to be sustained. I strongly recommend that the board reject these proposals. Thank you for the opportunity for me to provide feedback in this matter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** William Dodge

**Community of Residence:** Anchorage

**Comment:** I have fished the dipnetting area of the lower Kenai since it first opened up. I go with friends and family.

Remember, the fish that returns to Alaskan streams belong to ALL Alaskans, not just commercial fishermen who choose to make their living from all of our fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 159:**  
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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Dale Dosser

**Community of Residence:** Fairbanks, AK

**Comment:** Commercial services allow me to exercise my opportunity to harvest my personal use salmon. The access points along the copper river are becoming too too difficult for me to use as I age and my abilities decline to climb up and down the access points.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Alex Douthit

**Community of Residence:** Kenai

**Comment:** I'm a life long resident and was fishing guide for 20 years. I started guiding personal use fisherman when kings first closed on the Kenai I believe around 2012. I was amazed at how much positive response it revived residence loved having a safe knowledgeable way to get there personal use fish. It is the safest way for many people to get there fish and they don't have to own there own very expensive boat to do it. I have taken People that are wheel chair bound and elderly they other wise would have never had an opportunity to join in the fishery! Don't take away the people of the states right to access food in a safe manner!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Caleb Downing

**Community of Residence:** Anchorage, AK

**Comment:** Fishing is a tradition and heritage closely tied to Alaska. The only reason for the proposed restrictions is greed. The Bible is true when it says that the love of money is the root of all evil. We do not need more restrictions on out sporting/subsistence fishing.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.



*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
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<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Ben Dubbe

**Community of Residence:** Homer, AK

**Comment:** Proposal 154-Support with amendments

Amend so that it would not remove the ability to continue to use a reel on a skiff.

Proposal 163-Support

Guiding is not in line with the original intent of the personal use fisheries. If a person is being guided, it is no longer personal use, it is sport fishing.

Proposal 164-Support

If a person is exploiting a public resource, it seems obvious that they should be reporting their impact to the agency that is trusted to manage that resource. This is especially true if that public resource is being commercialized, as it is with guiding.

Proposal 165-Support

If a person is hiring a guide, then what they are doing is not subsistence fishing. Guiding abuses the subsistence regulation and commercializes what is supposed to be a non-commercial use of the resource.

Proposal 166-Support

This helps to close a loophole used to abuse the system.

Proposal 167-Support

In-season reporting is required for other user groups because it is a best management practice. It only makes sense that it would be the best management practice for subsistence and personal use fisheries that are using the same resource.

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<b>Proposal 11:</b>	<b>Proposal 156:</b> Support	<b>Proposal 164:</b> Support
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Support
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Support
<b>Proposal 82:</b>	<b>Proposal 159:</b> Oppose	<b>Proposal 167:</b> Support
<b>Proposal 87:</b>	<b>Proposal 160:</b> Oppose	<b>Proposal 168:</b>
<b>Proposal 153:</b> Support	<b>Proposal 161:</b> Support	<b>Proposal 169:</b>
<b>Proposal 154:</b> Support With Amendments	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Support	

**Submitted by:** Kari Dupree

**Community of Residence:** Anchorage

**Comment:** I have participated in subsistence/personal use fishery for a number of years. Our catch feeds my family till the next season.

I agree with Proposal 163. Guiding of persons engaging in personal use fisheries should not be allowed. Guides profit from subsistence/personal use fisheries and that is WRONG! Making money on subsistence/personal use fish harvest is WRONG!

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Support

**Proposal 164:**  
**Proposal 165:**  
**Proposal 166:**  
**Proposal 167:**  
**Proposal 168:**  
**Proposal 169:**





**Eastern Interior Alaska Subsistence Regional Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: (907) 786-3888, Fax: (907) 786-3898  
Toll-Free: 1-800-478-1456

In Reply Refer To:  
RAC/EI.22132.BM

DEC 28 2022

Art Nelson, Executive Director  
Board of Fisheries  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Mr. Nelson,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on three Board of Fisheries proposals that will be discussed at upcoming 2023 meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Eastern Interior Alaska Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 5-6, 2022, in Fairbanks. Among the items discussed were various proposed changes to the State of Alaska fishing regulations. The proposals that the Council discussed and our positions on those proposal are listed below by regional meeting.

***Arctic / Yukon / Kuskokwim Finfish***

Proposal 80 - Restrict subsistence king salmon harvest in the middle and upper Yukon River. The Council voted to **unanimously oppose Proposal 80**. The Council does not support this proposal and feels that its intentions are divisive, aiming to pit lower river and upper river users against each other. Further, it seeks to place a priority on commercial fishing in the



lower river, while restricting subsistence fishing in the upper river. This goes against a subsistence priority. There is no evidence to support the proponent's claims that up to 100,000 Chinook Salmon are being illegally harvested by upper river fishers. The Council feels it is important for all users to work together to conserve salmon and to equally share the burden of doing so.

### ***Alaska Peninsula / Aleutian Island / Chignik Finfish***

Proposal 140 - Amend the South Unimak and Shumagin Islands June Salmon Management Plan to reduce commercial salmon fishing time. The Council voted to **unanimously support Proposal 140**. The Council supports this proposal because there is a major conservation concern for Yukon River salmon that are intercepted caught in this fishery. As shown by previous genetic sampling projects, this fishery can intercept half of the Summer Chum Salmon bound for Western Alaska and the Yukon River. Interception of Yukon River salmon severely impacts the ability of people to meet subsistence needs on the Yukon River and other Western Alaska drainages. Summer Chum Salmon is a primary food source for Yukon River residents, especially for residents of the lower and middle Yukon River. The Yukon region has been closed to subsistence fishing for several years, while commercial fishers have been allowed to harvest the same stock of concern. This does not adhere to the subsistence priority nor sustainable management practices. Management needs to occur across the entire salmon ecosystem and should not ignore what happens in this fishery and its negative impacts on subsistence users in other regions.

### ***Statewide Finfish and Supplemental Issues***

Proposal 165 - Prohibit compensation for guide services in subsistence fisheries. The Council voted to **unanimously support Proposal 165**. The Council supports this proposal because using commercial guide services is contrary to what it means to practice subsistence. Subsistence by definition is noncommercial, and the Council does not feel guides should profit from it.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or [brooke\\_mcdavid@fws.gov](mailto:brooke_mcdavid@fws.gov).

Sincerely,

Sue Entsminger  
Chair Regional Advisory Council  
Eastern Interior Region

cc: Federal Subsistence Board  
Eastern Interior Alaska Subsistence Regional Advisory Council Members



Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 165: Support

**Submitted by:** Bill Eckhardt

**Community of Residence:** Sterling, Alaska

**Comment:** I am a 65 year resident of Alaska and have fished every year that I have lived in the state. I am submitting this letter in response to proposals that will come before the Board at the statewide Finnish meeting in March.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Deborah Eckhardt

**Community of Residence:** Sterling, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Sharon Efta

**Community of Residence:** Kenai

**Comment:** In regards to proposals 163-167, I support them all. Anyone who can pay a guide to take them dip-netting is not food insecure. As a matter of fact, these proposals do not go far enough. It would make a lot of sense to decrease the subsistence allowances and/or restrict the number of days dip-netting can occur. Every spring the dump in Kenai receives last year's freezer-burned fish that was not eaten. The lines at Fed-Ex are out the door with people sending stacks of boxes of fish to their friends and relatives in the lower 48. The purpose of subsistence fishing is not to spend exorbitant amounts of money to please people who live out-of-state. One day I was behind a man in the grocery store who inquired of the checker whether there was a dog rescue shelter in the area. He had driven down from Anchorage towing his freezer on his trailer and he wanted to donate last year's old fish to the dogs so he would have room in the freezer for this year's catch. The fact is that almost no family of four is going to eat 55 fish in a year. If you reduced the allotment to 10 per head of household and 5 per dependent, there would still probably be waste, but it may prevent the people with the \$200,000+RVs (who are unlikely to be food insecure) from coming to Kenai and dirtying up the beach for us to clean. It might also encourage them to do their dip netting closer to home, thereby reducing the carbon footprint of their summer greed-fest. The yearly migration of Anchorage area dip-netters makes the roads less safe as many are driving tired after they fish too long and try to drive home in one night, or get off work on Friday, go home to pack up and drive down here on the same day. The abuses of the privilege are out of control.

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<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Support
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Support
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Support
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Support
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Support	



**Submitted by:** Laef Eggan

**Community of Residence:** Anchorage

**Comment:** I fish to feed my family

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Clifford Ellington

**Community of Residence:** Anchorage

**Comment:** I am a resident of Alaska for 6 years.

I love getting into the outdoors. The outdoors in Alaska keeps me here. I fish with my family and we mostly subsistence fish. This is a great bonding opportunity for me and my 5 children as we prepare fish for year round use. This provide a way for me to feed my family and off set some of the high cost of living here in Alaska. It also teaches my children how to respectfully use the land and its plenty.

I usually fish the kenai and i als

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.



The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:  
Proposal 153:  
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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Gregg Embree



**Community of Residence:** OR

**Comment:** I've been sport fishing the Nushagak River for Kings since 1996. I have fished a minimum of 10 days every year 1996-2022. The decline in 4-5-6-7 salt King's has been alarming over the last 10 years. The abundance of 2-3 salt male kings IMO should be the only fish allowable for harvest. All 4 salt fish and larger and all female King's should be safely released in my opinion. IMO bait should be allowed and is not an issue with mortality on released fish. This is probably due to method. Perhaps no back bouncing bait or diver and bait. Keep 4 King's per angler per year. 2-3 salt male Kings only. Release all hens regardless of age. Allow 10 sockeye per day. Thanks for reading.

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Proposal 12:  
Proposal 13: Support  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
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Proposal 164:  
Proposal 165:  
Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:

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**Submitted by:** Trevor Embry



**Community of Residence:** Eagle River, AK

**Comment:** Proposal 163 is a blatant attack on residents ability to safely obtain their household take on fish for the year. Commercial fisheries take the lions share of biomass before it even reaches our rivers and we are left scratching our heads as we continually see more and more restrictions on what's left.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** William Emery

**Community of Residence:** North Pole

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary. I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Emily Engelbrecht

**Community of Residence:** Wasilla

**Comment:** My family and I fish to have food throughout the year same reason we hunt. We don't go to the store and buy meat or fish we get it from the land. The way God indented it to be.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Matthew Engelbrecht

**Community of Residence:** Wasilla, Alaska

**Comment:** I dip net every year for my family and it's a main source of our protein to survive. This will cause a very bad situation for our family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Salvador Estrada

**Community of Residence:** Eagle River, Alaska

**Comment:** I grew up in Alaska and moved away with my family for six years in 2013, but we returned in 2019 because we wanted a better quality of life centered around the outdoors. The commercial fishing industry threatens our way of life and is not sustainable, ethical, or reliable. Commercial fisheries should be the ones facing overbearing proposals, cuts, taxes, and regulations as evidenced by their trawling waste and bycatch and negative influence on habitats that support our way of life. In said proposals, commercial fishing representatives indicate personal use fishermen do not pay for management of fisheries. Perhaps that is because we do not destroy the environment or decimate populations as they do? It is a weak argument and demonstrates their lack of integrity and willingness to be objective and reasonable. The same proposal, (163) also mentions it is "unfair" to sportfishing license holders and commercial fishermen that these "resources" are commercialized by charters. The only unfair component is the vast amount of fish not going upriver for residents to put food on the table BECAUSE OF COMMERCIAL FISHERIES. Me, my wife, and our two sons (11 and 13 currently) utilize the personal use fisheries simply to put food on the table. Charters/guides facilitate our ability to access these areas, provide us a means to support our way of life, allow us to support our fellow Alaskans, and allow us to participate in a practical, sustainable fishing practice. I respectfully request the board not only oppose proposals 163-167, but pursue significant and increased regulations against the commercial fishing industry in Alaskan waters and drastically cut and reduce their access and ability to interfere with our way of life while attempting to monopolize the fishing industry. Commercial fishing is the enemy of the state and natural habitats, not personal use fisheries.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Virginia Eubank

**Community of Residence:** Wasilla

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Matthew Fagnani

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional

reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



BEFORE THE ALASKA BOARD OF FISHERIES

FOR A MARCH 2023 MEETING AT ANCHORAGE

**From: Joseph R. Faith, February 23, 2023**

**Re: Bristol Bay Nushagak Chinook Salmon Action Plan, Proposals 11-13.**

**I. I Support Action Plan Option No. 2 To Fish The Wood River**

I support option No. 2 to fish the Wood River to conserve king salmon. This option provides the best balance of the factors, in my opinion. Fishing the Wood River will help conserve Nushagak kings because the kings largely go up the Nushagak River rather than the Wood River. It will provide the most certainty for king conservation because Nushagak kings won't be caught on the Wood River. The 'cumulative effect' of this conservation effort to the king run over a period of years should be determined.

Fishing the Wood River will provide an economic benefit. Wood River surplus fish will be caught and not foregone. Of course, Wood River escapement must be met, providing for future economic benefit.

Wood River fishing could be done on a 24 hour basis without regard to allocation to make sure king conservation occurs.<sup>1</sup> Fishing could be restricted to 4 1/2 inch mesh to catch more of the small Wood River fish (1.2 fish). An end date could be established to discontinue use of the Wood River District once enough kings have escaped or could reasonably be predicted to escape.

A disadvantage of Option No. 2 is that some Muklung River kings will be caught because the Muklung River branches off the Wood River. I could not find any information on the yearly Muklung king numbers (the Muklung River is before the counting station on the Wood River). Additionally, Nushagak reds will be foregone under this option until the Wood River District fishing is discontinued. I do not know the number of Nushagak River reds that will be foregone.

**II. I Disagree With Action Plan Option No. 4 To Fish 4 3/4 " Mesh Because Fishing Will Still Be In the Nushagak District.**

I disagree with option No. 4 to fish 4 3/4" mesh because fishing would still be in the Nushagak District. Smaller mesh nets (i.e. 4 3/4 inch) will catch king salmon.

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<sup>1</sup> Consideration might be given to fishing with 4 3/4 inch mesh in Schooners Channel and Flounder Flats up to Ekuk Cannery in the Nushagak District until June 30<sup>th</sup>. In my experience, the kings appear to run mostly on the West side (West and Middle Channels), especially early on. The kings appear to run increasingly on the East side (Schooners Channel) starting about July 2. I personally disagree with fishing Schooners and Flounder Flats early because it is fishing the Nushagak District.

## **A. Jack King Salmon Will Be Caught And Are Important To Reproduction.**

4 ¾ inch mesh will catch jack king salmon that are the same size as the reds. These jacks are important to reproduction. In a July 19, 2022 article discussing the reproductive success of jacks in the coho fishery in Auke Creek at Juneau, it said,

The research compared the reproductive success of jacks to that of full-size males, and examined the contribution of jacks to the genetic diversity in a population of coho salmon. The study found that jacks had lower reproductive rates than regular-size males, but they fathered 23% of the adults returning to spawn. The research also concluded that jack presence in the population increased genetic diversity by 13%, and that removing jacks from the population generally reduced genetic diversity.<sup>2</sup>

Nushagak kings are getting smaller and younger. See, The trends in size and age of Nushagak River king salmon, 1980-2022, submitted to the BOF at its 2022 Bristol Bay meeting as RC049.

## **B. Larger King Salmon Mortality Study Needed.**

Larger king salmon (bigger than jack) will run into the 4 ¾ inch mesh nets in the Nushagak District. Even if they don't get caught in the first net, they will run into another net, then another one, and so on. What percentage of these larger kings get caught? Do larger kings actually bounce off a smaller mesh net, as is sometimes assumed? What percentage are injured or "drop out?"

What's the immediate and delayed mortality of larger kings when smaller mesh nets are fished by a typical number of drift and set netters for a normal soak time throughout an average Nushagak fishing period? The comparison is not between 4 ¾ inch mesh nets and 5 1/8 inch mesh nets to answer this question. The comparison is between nets in the water in the Nushagak District and no nets in the water in the Nushagak District by fishing the Wood River District.

The sports fishery did a mortality study on kings.<sup>3</sup> The commercial fishery should do one also to determine whether king salmon survive to contribute to rebuilding their population when smaller mesh nets are fished.

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<sup>2</sup> Alaska Sea Grant: Research shows how jack salmon contribute to population and genetics, p. 2., and Reproductive Success of Wild Jack Coho Salmon Males in Auke Creek, Erika King, Megan McPhee, David Tallmon, Joshua Russell, and Scott Vultek, Southeast Regional Planning Teams Meeting, April 6, 2022.

<sup>3</sup> See DRAFT, Fishery Data Series, Mortality of Chinook Salmon Caught and Released Using Sport Tackle in the Nushagak River, 2017-2018 by Lee K. Borden and Jason E. Dye, November 2022.



### **C. ADF&G Should Supply Actual Number of Kings Saved Based On Real Data When 4 ¾ Inch Mesh Is Used**

ADF&G says, “Reducing mesh size to 4.75 may increase sockeye salmon harvest, reduce chances of sockeye salmon overescapment, reduce commercial fishing time for sockeye salmon because the fleet is more efficient, and fewer/shorter openers translate into less king salmon harvest. Shorter nets would result in less total gear in the water and reduced harvest of king salmon.”<sup>4</sup>

First, what is the number of increased sockeye salmon harvest with the smaller mesh size (i.e. 4 ¾ or 4 1/2)? Any sockeye harvest should only be counted as an increase for Nushagak River sockeye, not Wood River sockeye. Wood River regulation<sup>5</sup> already requires 4 ¾ inch mesh size for the smaller reds (1.2 fish), which can be caught in the under utilized Wood River District (change regulation for king conservation for 24 hour fishing without regard to allocation to utilize more). ADF&G forecasts 4.85 million 1.2 fish and 2.27 million 1.3 fish for the Wood River for 2023.<sup>6</sup> In contrast, Nushagak River sockeyes would be an increase in sockeye harvest when fishing only 4 ¾ mesh nets in the Nushagak District. However, Nushagak River sockeye tend to be the larger 1.3 fish. ADF&G forecasts 1.72 million 1.2 fish and 4.48 million 1.3 fish for the Nushagak River for 2023.<sup>7</sup> In other words, it’s not an increase in sockeye harvest under Option 4 when the same smaller Wood River sockeye can be caught with the same smaller mesh nets in the Wood River District where Nushagak king salmon will be conserved. The increase in sockeye harvest would be the smaller Nushagak River sockeye (1.2 fish that are less abundant) when the small mesh nets are fished in the Nushagak District.

Second, what’s the number of fewer/shorter openers? ADF&G provides no numbers.

Third, how many kings will be saved with the smaller mesh size under Option No. 4? Kings will be caught or injured as long as fishing occurs in the Nushagak District, even with smaller mesh nets. In addition, ADF&G provides no numbers on how many kings will be saved. It is too convoluted and speculative to conclude that smaller mesh nets may increase the sockeye harvest that may reduce commercial fishing time for sockeye salmon that then will result in fewer/shorter openings that translates into less king salmon harvested, unless actual numbers are calculated with real data.

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<sup>4</sup> Nushagak River King Salmon—Stock Status and Action Plan, Alaska Department of Fish and Game, Report to the Alaska Board of Fisheries (November 29, 2022), p. 8.

<sup>5</sup> 5 AAC 06.358 (c) (6).

<sup>6</sup> ADF&G 2023 Bristol Bay Sockeye Salmon Forecast, Table 2.

<sup>7</sup> ADF&G 2023 Bristol Bay Sockeye Salmon Forecast, Table 2.



**III. I ask that ADF&G have test boats in the Nushagak fishing district with the same type of sonars as are used upriver by ADF&G at the counting station on the Nushagak River.**

I ask that ADF&G have test boats in the Nushagak fishing district with the same type of sonars as are used upriver by ADF&G at the counting station on the Nushagak River. Test boats in the actual fishing district with these sonars on the nets could see and video fish on about 100 feet of net. See Attachment A, Sonar Tools, DIDSON, Alaska Fisheries Sonar, Alaska Department of Fish and Game. This would allow ADF&G more information to determine the strength of the king run in the actual fishing district.

These sonars would also provide ADF&G some information to evaluate what happens to the kings at the net. What percentage of kings get caught? Do kings actually bounce off the net? What percentage are injured or “drop out?”

The Nushagak-Mulchatna King Salmon Management Plan Committee recommends the use of a Nushagak District test fishery to assess the relative abundance of sockeye and king salmon.<sup>8</sup>

I’ve drift fished predominantly the Nushagak district for two decades, including many king openers during that time. I thank you for your time and consideration.

Dated: February 23, 2023

  
\_\_\_\_\_  
Joseph R. Faith

PO Box 1316  
Dillingham, AK 99576  
Bristol Bay Drift Permit Holder (S03T)

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<sup>8</sup> BBRsRI Report prepared for the Nushagak-Mulchatna King Salmon Management Plan Committee and Alaska Board of Fisheries, Final Draft, Public Comment, November 14, 2022, p. 15.



# Attachment A, Joseph R. Faith, Comment, Nushagak Action Plan, 2.23.23

2/18/23, 9:24 PM

Sonar Tools: DIDSON, Alaska Fisheries Sonar, Alaska Department of Fish and Game



Alaska Department of Fish and Game

[ADF&G Home](#) » [Fishing](#) » [Research](#) » [Sonar](#)

## Alaska Fisheries Sonar

Sonar Tools: Imaging Sonar



### Imaging Sonars

**DIDSON** - When the Alaska Department of Fish and Game adopted Dual frequency IDentification SONar (DIDSON) as a tool for detecting fish, inriver fisheries sonar advanced a giant leap forward. ADF&G biologists first encountered DIDSON at the University of Washington, where the Applied Physics Laboratory had developed it as a military tool for detecting enemy divers and underwater mines. DIDSON, now manufactured by the Sound Metrics Corporation (SMC)\*, has become the sonar technology of choice for inriver fisheries sonar projects all around the world.

**ARIS** - The latest generation of DIDSON technology, known as ARIS (Adaptive Resolution Imaging Sonar), was first tested in Alaska in 2012. ARIS provides more flexibility than its predecessor by allowing the user to vary a wider number of parameter settings. Depending on need, this can enable improved image resolution and finer control over the range covered during sampling. ARIS is currently being used in several Alaskan rivers for both counting and sizing salmon.



ADF&G uses several models of imaging sonars and lenses to meet the varying needs of its sonar projects. In rivers where biologists need particularly high-resolution images of fish far from shore, for example, DIDSON and ARIS are equipped with a high-resolution lens (lower left) as opposed to a standard lens.

### Sonar Images

Counting fish using DIDSON and ARIS is similar to counting fish from a counting tower. A technician in a counting tower watches and counts fish swimming in the water below, while a technician watching DIDSON or ARIS video counts images of swimming fish.

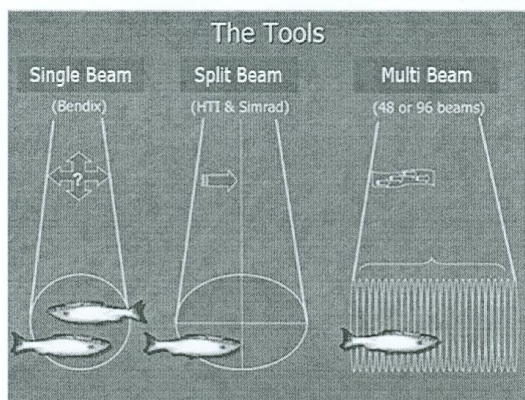
But unlike a technician counting fish from a tower, a technician counting DIDSON and ARIS fish images can slow down, replay and even stop the video if they are fatigued or lose their place. Imaging sonars can produce high-resolution video images of fish, in part because it uses high-frequency sound waves that enable it to detect the entire surface of the fish. DIDSON was the first inriver sonar to be able to do this. Using DIDSON or ARIS, technicians can better distinguish between fish that are swimming side-by-side or head-to-tail and determine which direction fish are swimming. Knowing the direction in which fish are traveling is important in rivers where fish tend to mill. Scroll to the bottom of this page to see examples of DIDSON images.

### Multi-beam

Imaging sonars are multi-beam sonar that emit a fan of sonar beams into the water column horizontally. When emitting 48 beams, DIDSON and ARIS can be used to detect fish up to 164 feet from the transducer. When emitting 96 beams, they can be used to detect fish up to 98 feet from the transducer. The resolution of the images produced by DIDSON and ARIS increases with the number of beams used.

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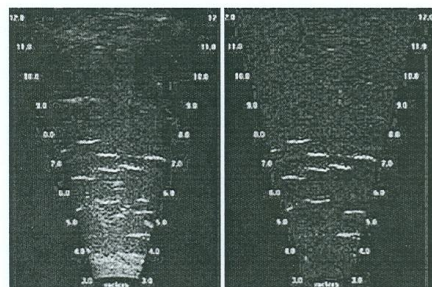
Sonar Tools: DIDSON, Alaska Fisheries Sonar, Alaska Department of Fish and Game



Most sonar technologies—including Bendix and split-beam sonar—use only one beam to ensnify an area of the river. Imaging sonar uses a fan of multiple beams.

### Operating over rough terrain

One of the advantages of imaging sonar is that biologists can use it over a relatively uneven river bottom. Prior to DIDSON, biologists could not use sonar over an uneven river bottom without compromising fish detection. DIDSON and ARIS software allows an observer to subtract the display of the bottom and stationary objects from the screen, leaving only the moving fish images.



The frame at left shows an image with the bottom and stationary objects displayed while the frame at right shows the same image without them.

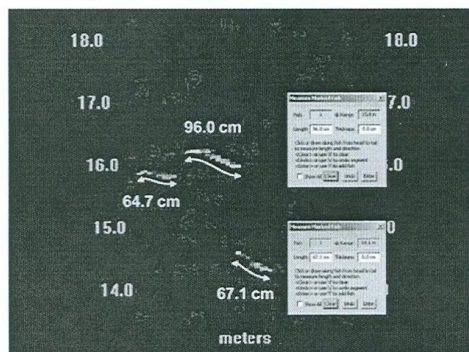
### Measuring fish lengths using DIDSON and ARIS images

No sonar system used in rivers has the ability to differentiate fish species of similar size based solely on sonar data. However, length measurements of migrating salmon obtained from DIDSON and ARIS images have been shown to be sufficiently accurate for use in differentiating between fish species of different sizes. Larger king salmon, for example, can be distinguished from other smaller species of fish such as sockeye salmon using length measurements taken from DIDSON and ARIS images. Sufficiently accurate length estimates from DIDSON and ARIS images of fish can be obtained up to a range of approximately 100 feet from the transducer. ADF&G biologists on the Kenai River started using fish lengths from DIDSON images in 2010 and ARIS images in 2012 to differentiate between large king salmon and other smaller species of salmon.

As another possible means of separating fish species using sonar, biologists have examined differences in tail-beat frequencies observed in DIDSON video images. More research is necessary to determine if tail-beat frequency can be used to differentiate between species.

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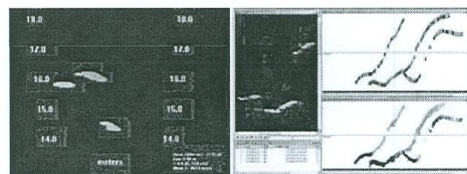
Sonar Tools: DIDSON, Alaska Fisheries Sonar, Alaska Department of Fish and Game



Marking tools included with the DIDSON and ARIS software are used to obtain measurements directly from fish images.

### Processing large quantities of data

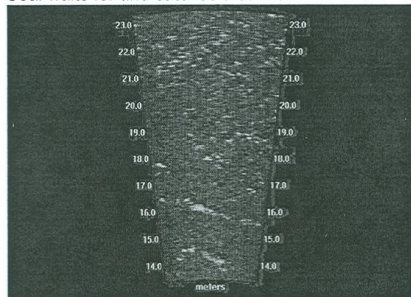
To use an imaging sonar as a tool for classifying fish species based on size, biologists develop a protocol that allows for processing large amounts of data in a manageable amount of time. Imaging sonars can produce more than 30 GB of data per day for some ADF&G projects. Reviewing data and manually measuring individual fish is both labor and time intensive. ADF&G has investigated protocols to automate fish size measurements, but all are site-specific and none have yet proven satisfactory for the high-density fish passage rates that occur in Alaskan rivers. For this reason, ADF&G will continue to manually measure fish images until automated methods are shown to be accurate over widely varying environmental conditions and high density passage.



Examples of automatic fish sizing software from SMC (left), and Myriax, LTD (right).

### DIDSON Image Examples

Seal waits for and catches a salmon:



Hooligan migration:



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Sonar Tools: DIDSON, Alaska Fisheries Sonar, Alaska Department of Fish and Game

Seal chases salmon:

Two smaller salmon followed by a large King  
Salmon:

More from ADF&G



More from ADF&G





**Submitted by:** Artem Finko

**Community of Residence:** Anchorage

**Comment:** We live in a great state where you can partake and enjoy summer months fishing, either its in the Alaskan southeast or all the way by the Bering Sea. Recreational fishing allows our family to enjoy Alaskan outdoors and harvest enough food for the upcoming cold winter months, especially considering current state of being and over the head food prices across the nation have only increased the value and importance of personal subsistence.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 82:**  
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**Proposal 153:**  
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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Mark Fitzhugh

**Community of Residence:** Soldotna, Alaska

**Comment:** I depend on dip netting and subsistence fishing to feed my family, As an Alaska native it is also my heritage thatbb can I want to pass on to my children and others as well. To many years I have watched the greed of the commercial fishermen deplete the fish stocks and push questionable studies to support their position's. Too many times they have thrown money and their weight at those who will cow to the demands they have. The fish should be shared between all parties equally

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Collins Fleming Sr

**Community of Residence:** Kenai AK



**Comment:** I'm an Inupiaq Eskimo I help A Lotta elders with fishing during July for dip netting we all know the dip net there's only take with their families need put needs to be addressed is the bycatch? That does more harm to all of the fish than anything else we Eskimos believe in only taking what we need I only get 63 fish during dip netting that's really not enough to support my family as we are

big fisheaters. The commercial fisherman take more and throw away more fish and do more harm and you guys have not shown us any proof that they are taking care of this issue. The trawlers are the biggest reason why our fish are dwindling down and our big king salmon are almost gone. This breaks my heart! Regardless of race, everybody has a Family that they feed with fish and you guys do set the guidelines. We respect that, but what we are giving is not really enough for personal family consumption as we smoke we dry we freeze and try to make it stretch throughout winter I have never lived in a place as a dog owner, where I cannot fish for my dogs, I wish I can feed them traditional fish as my ancestors have done for hundreds and thousands of years here in Alaska

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** James Ford

**Community of Residence:** Anchorage, AK

**Comment:** I fish in the personal use fishery on the Copper river. I use a charter service to access the river. I would not be able to harvest salmon for my family if I did not use a charter to provide safe access to the river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jacqueline Foss

**Community of Residence:** Sitka, AK

**Comment:** Dear Chair Carlson Van-Dort and Board of Fisheries,

These are my personal comments on a few pending proposals for the March State-wide Board of fish Meeting. I am a commercial fisherman as well as a sport and subsistence fisherman. My family rely on fish to supply our income, recreation, and dinner at least 4 nights a week. I applaud the State of AK and the dedicated managers at ADF&G for working to balance all of the competing interests for Alaska's resources.

I oppose Proposal 159 - Close commercial fishing for a given species within one-fourth of a mile of any area closed to sport fishing for that species. This unnecessarily complicates already complicated management. ADF&G managers coordinate internally and with hatchery managers to effectively managed mixed stock fisheries.

I oppose Proposal 160 - Require surrender proceeds gained from sale of wild king salmon caught in hatchery terminal areas...This proposal makes a lot of assumptions. It may take weeks to determine the origin of some of the fish and the process for getting that fishermen to pay back that portion of their fish ticket would be administratively expensive and challenging. Plus without 100% marked select it would be impossible to know. Finally, ADF&G managers are best able to make the best decisions using their tools.

I support Proposal 163 - Prohibit guiding in personal use fin fisheries as follows:..I support prohibiting guiding in personal use finfish fisheries. I do not support commercialization of personal use or subsistence fisheries because it increases competition for those of us living in remote communities. This ban already exists in the subsistence fishery on the Copper River.

Comment on Proposal 164 - Establish registration and reporting requirements for personal use guides and transporters as follows:..I do not support guiding in personal use fisheries but I always support appropriate recording of catch and users across all sectors. This regulation aligns freshwater guiding with saltwater guiding and there shouldn't be a difference in how these are managed. I believe that all fishery resources harvested should be reported from all fisheries including sport, personal use, subsistence and commercial as it is necessary information for accurate and sustainable management.

I support Proposal 165 - Prohibit compensation for guide services in subsistence fisheries, as follows:...Guided sport involvement in subsistence fisheries is incompatible with the customary and traditional means of resident harvest. Sharing expenses is common and should be allowed to continue, however outright paying for a service is inappropriate. This proposal would align several regulations prohibiting guiding in Glennallen, Kodiak, and the Copper River. Subsistence fisheries and personal use fishers should not be commercialized or capitalized.

Thank you

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Proposal 157:  
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Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161:

Proposal 162:  
Proposal 163: Support  
Proposal 164:  
Proposal 165: Support  
Proposal 166:

Proposal 167:  
Proposal 168:  
Proposal 169:



**Submitted by:** Cyndie Fox

**Community of Residence:** Anchorage, AK

**Comment:** I fish the Kenai. and PWS.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Dennis Franjs

**Community of Residence:** Anchorage

**Comment:** Alaskan residents should always be put first especially when it comes to these types of decisions. Most commercial fishing is done by outside companies or people which they are only about the profits they make. All non-resident owned commercial fishing should be banned. Want to commercial fish in Alaska then you have to be an Alaskan resident.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Charlie Franz



**Community of Residence:** Homer

**Comment:** Please maintain the personal dip net program as is. I am sick and tired of the commercial fishermen acting like the fish belong to them just because they have been fishing an area for a period of time. What happened to using resources to benefit all Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose  
**Proposal 164:** Oppose

**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



Chair Van Dort and members of the Board of Fisheries:

Feb 23, 2023

I have been an Alaskan resident and fisherman for over 40 years. I have participated in multiple Subsistence, Personal Use, Sport and Commercial fisheries over that time.

I SUPPORT proposals 163, 164 and 165. The Subsistence fishery and its stepsibling the Personal Use fishery are unique in that they are exclusively reserved for Alaskan residents. They provide Alaskans with the chance to personally harvest the state's bounty with fishing gear that is more efficient than rod-and-reel and without (for the most part so far, hence the need for these proposals) directly competing with financially-driven interests. The unfortunate reality of capitalism is that unlike one's appetite for eating salmon, commercial operators' desire for profits lacks any inherent limitation. Alaskans who regularly participate in Personal Use or Subsistence fisheries have learned how much fish (or shellfish, or game) their families will consume and will stop harvesting once they have caught enough. However, industry- in this case the guiding industry, knows no such limitation and is incentivized to drum up an ever-increasing number of clients to generate more profits. This increases competition for the resource, not only directly threatening all other established users in full-allocated fisheries, but in the longer term is a particular risk to the priority that has often been granted Personal Use fisheries. Unlike Subsistence, P/U fisheries are not Constitutionally-guaranteed priority, but enjoy their current status only because past Board of Fisheries members felt that they were deserving of it- in part because the impacts were anticipated to be limited by the number of likely participants. If the number of P/U fisherman increase and the characteristics of the P/U fisheries and P/U fishermen change due to increased guiding, future boards may find that those P/U fisheries are no longer be deserving of prioritization, to the detriment of those who have long participated.

Proposal 165 closes a particularly egregious loophole. Guiding has no place in a subsistence fishery<sup>1</sup>as the BOF recently recognized at the 2021 PWS meeting when the BoF adopted RC 100 to stop the guiding of subsistence fishermen in the Glennallen subdistrict. The BoF should now extend this prohibition to all subsistence fisheries in the state. Subsistence fishing is by a definition customary and traditional activity. There is no custom of hiring a guide to subsistence fish and furthermore, the tradition is necessarily limited to those with access to the resource. If the BoF openly approves of marrying the Constitutional priority of subsistence fishing with the insatiable appetite of capitalistic interests, all other users of our fully-allocated resources will suffer.

Tad Fujioka

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Proposal 157: Oppose  
Proposal 158: Oppose  
Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161: Support With Amendments  
Proposal 163: Support  
Proposal 164: Support  
Proposal 165: Support

**Submitted by:** Lynn Ganter

**Community of Residence:** Soldotna

**Comment:** I am 74 years old and I subsistence dipnet at the mouth of the Kenai river. I fish with my daughter and grand-daughter and love every minute of the whole experience. We pulled off, in one day our quota for the year!! I have the parking permit hanging on the doorknob of my closet. The reds are a regular part of my diet. If I should die with a dipnet in my hand and a fish in the net, I'll die a happy man : )

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

On one good day, the commercial fishermen catch far more fish than the entirety of the subsistence fishery would catch in the whole season. Envy and greed are terrible things. The fish we catch are already in the rivers and therefore not available to commercial fishermen. For some people, these fish are critical to their winter food supply.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



George Garner  
Anchorage, AK Resident

Proposal 163:

I am opposed to this proposal for several reasons. Safety is one of the main reasons that I oppose this proposal. Guides, as far as know, only operate on the Kenai and Copper River personal use fisheries. These locations are dangerous waters to navigate with a vessel either due to swift currents on the Copper River or inexperienced operators and heavy traffic on the Kenai River during dipnet season. The guides operating in these areas provide at least some resemblance of safe boat operation in these areas. The guides have at least had some training in safe boat operation and have experience navigating these waters during the personal use fishery season. The guide services also allow for those of us that can't afford their own personal vessels or afford to take several days off of work to dipnet from the banks to participate in the personal use fishery. Currently to participate in the personal use fisheries, you are required to possess a sport fishing license and in some cases pay an extra fee for the personal use permit. Therefore, personal use fishermen do, in fact, help pay for management of the fisheries contrary to the information in the proposal.

Proposal 164:

I have no issue with a guiding or transporting license requirement for personal use fishery guides. I do have an issue with duplicate reporting requirements. Personal use fishermen are required to report all harvested fish anyway. Fish and Game staff don't have time to sort through possible duplicate reporting that this measure would cause.

Proposal 165:

I oppose this proposal. It seems like this proposal is against the entire basis of the US economy. By operating guide services during times of commercial closure, at least the guides are contributing to the economy by providing a meaningful service. Additionally, to participate in subsistence fisheries one must qualify to participate. If qualified and using the allowable means of catch, paying a guide should be allowed. Generally, a single payment to a guide for a day or two of service would be more affordable than purchase and upkeep of a boat; therefore, allowing more low income persons to participate.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 155: Support  
Proposal 156: Support  
Proposal 157: Support  
Proposal 158: Support  
Proposal 159: Support  
Proposal 160: Support  
Proposal 161: Support  
Proposal 162: Support  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Support  
Proposal 167: Support  
Proposal 168: Support  
Proposal 169: Support

**Submitted by:** Rickey Gates

**Community of Residence:** Anchorage

**Comment:** My wife and I are retired Alaska residents, and we harvest fish to supplement a healthy diet. We prefer fishing in Chitna on the Copper River and occasionally we've the Kasilof River. We have chartered in Chitna with Hemm's and also Rockskip Charters because we're over 70 years old. Accessing the designated fishing areas by foot is getting more difficult and hazardous as we get older, especially in Chitna.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Dennis Gease

**Community of Residence:** Kenai, Ak

**Comment:** Dennis Gease , I'm 85 years old ,disabled and unable to walk. Have been living in Alaska for 25 years. Been. Participate of the dip-netting community since its beginning. My wife and I count on friends and

family to catch our quota of fish to help feed us for the year. Before I was disabled, I was very active in the dip-net community. It would be very disheartening to see all the work we have done in the past years to be torn apart and negated at this time. The ability to be a dip-netter and be involved in all its family values and the ability to provide food for one's family is so stated in our Constitution, we (all) the citizens of Alaska have the right to basically fish for our personal use and subsistence rights .....

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Keith Genter

**Community of Residence:** Wasilla

**Comment:** Dip netting is my only option for feeding my family with our natural resource. I'm disgusted by what the commercial fishing industry has done to the folks that live here locally. Please help protect the residents from outsiders who are profiting from our resources and restricting us from our way of life.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Kaylee Gikas

**Community of Residence:** Valdez

**Comment:** Hi,

I am a life long subsistence and personal use user and have always had a had time accessing these fisheries. I choose to use a Charter for access because I cannot afford to buy a boat or have land access to operate or money to build a fish wheel. Charters have given me the opportunity to safely participate in the Copper River and Kenai River Fisheries.

I OPPOSE Proposals 163, 164, 165, 166, 167 as my family is still reeling from the Copper River closure the board approved in Cordova in 2021. In 2022 I was not able to participate due to the late start in the PU on the Copper and its multiple closures in July. Please don't ban my families access to participate in the harvest of our food.

Thank you

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Darin Gilman

**Community of Residence:** CORDOVA

**Comment: Proposal 165:**

Support, there is precedent set already in other areas of the state that prohibit profiting from subsistence fisheries. Making it a statewide regulation would stop people from taking advantage of re-commercializing fisheries.

**Proposal 166:**

I support the proposal I submitted. As was said in my proposal there is precedent set already in game management that establishes statewide bag limits of resources. Recently I discovered that there was precedent set in Subsistence Fisheries (5 AAC.01.645) as well by establishing bag limits for subsistence salmon fisheries. Establishing a statewide Personal Use bag limit would just bring it in align with existing regulations.

**Proposal 167:**

I support this proposal sent in by CDFU. This would allow managers to have more accurate data for potential in season management in times of weaker returns.

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<b>Proposal 11:</b>	<b>Proposal 156:</b> Support	<b>Proposal 164:</b> Support
<b>Proposal 12:</b>	<b>Proposal 157:</b> Support	<b>Proposal 165:</b> Support
<b>Proposal 13:</b>	<b>Proposal 158:</b> Support	<b>Proposal 166:</b> Support
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Support
<b>Proposal 87:</b>	<b>Proposal 160:</b> Oppose	<b>Proposal 168:</b> Oppose
<b>Proposal 153:</b> Support	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b> Oppose	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Support	

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**Submitted by:** Kari Gilman

**Community of Residence:** Anchorage

**Comment:** 166 and 167

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b>
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Support
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Support
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b>	

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**Submitted by:** Mark Glassmaker

**Community of Residence:** Soldotna

**Comment:** I live on the Kenai River and have raised my family in Soldotna.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and



access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Scott Glover

**Community of Residence:** Wasilla

**Comment:** I am retired and my wife and I enjoy and depend on our Personal Use fishing. Please Do Not restrict any more of our rights by limiting this great resource.

I also use charters annually and resent the limits already placed on them. Do NOT add more.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.



Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Raine Golden

**Community of Residence:** Fairbanks

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Luke Goldent

**Community of Residence:** Fairbanks, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Miguel Gomez

**Community of Residence:** Anchorage AK

**Comment:** I am long time resident of anchorage that has raised family with subsistence harvest from the copper river. Started fishing when i was younger in the old ways of climbing cliffs and using ropes for safety. As i am older i depend upon the safety of the guided boat to continue harvesting.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Alyssa Goulet

**Community of Residence:** Chugiak ak

**Comment:** We fish to feed our family through the winter. Subsistence food gathering is apart of our native heritage. We dip copper, kasilof, and rod and reel many rivers throughout alaska. We go with three, sometimes four, generations of Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:

Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:

Proposal 169:



**Submitted by:** Frederick Graham

**Community of Residence:** Anchor Point, AK

**Comment:** I subsistence hunt and fish in Alaska and having been doing so for ten years. We are reliant on salmon and all seafood and wild game for our food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
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Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Wilbur Graves

**Community of Residence:** Anchorage, AK

**Comment:** I am 100% disabled veteran. I know many disabled alaska residents need to hire a guide to Dipnet, as do elderly residents. Taking away the ability to hire a guide is the same as taking away their right to catch their food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Dan Green



**Community of Residence:** Soldotna

**Comment:** I am not a commercial fisherman and I have no specific concerns with harvesting of salmon, however the most important issue is preservation of the resource. After years of watching the Kenai River dip net fishery the greed and excess is disgusting. Really makes me wonder how many fish actually are used. I would encourage a smaller bag limit and a restriction on participating in more than one fishery after a specific limit is achieved in a specific area.

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<b>Proposal 12:</b>	<b>Proposal 156:</b>	<b>Proposal 163:</b>
<b>Proposal 13:</b>	<b>Proposal 157:</b>	<b>Proposal 164:</b>
<b>Proposal 82:</b>	<b>Proposal 158:</b>	<b>Proposal 165:</b>
<b>Proposal 87:</b>	<b>Proposal 159:</b>	<b>Proposal 166:</b> Support
<b>Proposal 153:</b>	<b>Proposal 160:</b>	<b>Proposal 167:</b> Support
<b>Proposal 154:</b>	<b>Proposal 161:</b>	<b>Proposal 168:</b>



**Submitted by:** Todd Griffith

**Community of Residence:** Anchorage, AK

**Comment:** I fish the Kenai, Kasilof, Russian, Seward, Homer, Ketchikan, Bird Creek. I take my young daughters fishing which is one of our few common hobbies. This includes subsistence and sport fishing. We are responsible in our harvest, efficiently cleaning, storing and consuming with very, very little waste. I see the value in preserving this time-honored tradition for our residents. We are responsible with our harvest because we worked quite hard to get it!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Lamar Gunter

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Josh Hagberg



**Community of Residence:** Eagle River

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** George Hall

**Community of Residence:** soldotna

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kraig Hammond

**Community of Residence:** Anchorage Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans

opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Stephen Hampton

**Community of Residence:** Kenai, Alaska

**Comment:** I sport fish and personal use dipnet mainly in the Kenai river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 155:</b>	<b>Proposal 162:</b>
<b>Proposal 12:</b>	<b>Proposal 156:</b>	<b>Proposal 163:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 157:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 158:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 159:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 153:</b>	<b>Proposal 160:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 154:</b>	<b>Proposal 161:</b>	<b>Proposal 168:</b>

**Submitted by:** Ross Harding

**Community of Residence:** Kenai

**Comment:** I oppose any restrictions on the kenai personal use dip net fisheries. I live on the kenai River mile 10. The only thing I wish we could do is have an orientation boating requirement for anyone operating a power boat in this fishery . Just like is required to huntvin some units like 13, let's make it a safer fishery.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Tim Harper

**Community of Residence:** Anchorage, AK

**Comment:** Hi, my name is Tim Harper. I am a lifelong Alaskan who has participated in Alaska's fisheries. Fishing for my family is something that builds bonds as I help both my parents and teach my kids by participating in both cook inlet, and Copper River personal use fisheries. As proposed these new regulations would impede my ability to effectively participate in these fisheries. My wife and I both work full time to support our three children. There is no economic or social benefit only encumberment of choice with increased

costs to the state's budget. Also, I would like to point out the economic multipliers for charters compared to commercial fisherman indicate that charters generate more economic activity than commercial fishing.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jeff Harris

**Community of Residence:** Anchorage Alaska

**Comment:** Our family does a charter every year. Please do not close commercial charters for dipnetting.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Cook Harry

**Community of Residence:** Fairbanks, Ak

**Comment:** We, the people of alaska deserve the rights to our land and our way of life. We require the animals of the land and fish of the water to support our way of life. Outsiders like our fish and our animals but do not require them to survive, if you take away our animals ALL alaska will suffer, if you ban commercial fishing it will just hurt the commercial fisheries.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Michael Harvey

**Community of Residence:** Anchorage AK

**Comment:** I substance dip in both the Copper and Kenai Rivers and have for at least 20 years. The power of the commercial fishermen on the State has long frustrated me and hasn't been diminished over the years, mainly due to these types of 'bully over reach' moves. What AK really should do is implement a head-tax on commercially caught fish and use those proceeds to offset State funds for harbor maintenance costs, which would unburden non-commercial folks from paying for the infrastructure used primarily by the commercial fishing fleet.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Shawn Hay

**Community of Residence:** Wasilla

**Comment:** These subsistence harvest opportunities are vital for Alaskans in marginalized communities and remain a way of life for many others. These proposals are in direct opposition to the freedoms Alaskans have used to feed their families, nothing more. With climate change flexing the need for greater community resilience, why restrict the ability for Alaskans to prepare via subsistence. None of these proposals sound fair or equitable for Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jeff Hayes

**Community of Residence:** North Pole

**Comment:** I am a husband and father of 5 and I rely on Copper River dipnetting as a reliable and healthy source of food for my family. I am self-sufficient in that I usually ATV in for a few days and fish from the bank/cliff but also have many friends who use charters to fill their family freezers. I have been dipnetting for 7 years since I first came to Alaska and I plan to raise my children here, retire here, and happily die here.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Alex Hedman

**Community of Residence:** Eagle River

**Comment:** I fish to provide high quality meat to my family. As a resident of the greater Anchorage area, my two primary fisheries are the Copper River basin and the Kenai Peninsula.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Richard Heller

**Community of Residence:** Palmer, AK

**Comment:** I'm a 100% disabled veteran and use these services to be able to access the fisheries. The state has bag limits already set. What is not in check are the trawlers that are most likely effecting every run of salmon, all over the state. I appose these proposals.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Rick Helton

**Community of Residence:** Copper center, Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jenna Hem

**Community of Residence:** Chitina

**Comment:** Proposal 163 Prohibit guiding in personal use fin fisheries

**OPPOSE**

My comments address the Chitina personal use fishery to which I rely on as a food and income source. Eliminating these few charter operators and putting a stop to businesses that have existed for many years would be a bad decision. These operators are not in the business of selling fish but instead they sell their hard earned knowledge, skill on an unforgiving river, safety in professional operation of equipment and opportunity for Alaskan residents to feed their families. Equating the guiding of Alaskan residents legally taking fish to the mass harvest of the commercial fishery is unequal and incomparable. This proposal has no basis in science. Eliminating these professional operators would pose an increased safety risk. The Copper River is unforgivable and one mistake could cost lives. As a local first responder I have been on many calls where these local boat operators have assisted. Aiding with knowledge of the river and speed of response, these boat operators get EMS personnel to those in need or vice versa. An ambulance response can take an hour, AST even longer. Again, this proposal has no basis in science and only seeks to destroy local Alaskan business owners.

Proposal 164 Establish registration and reporting requirements for personal use guides and transporters

**OPPOSE**

Redundant. It is absolutely POSSIBLE for the department to collect data to regulate and manage these fisheries because they already do. ADFG uses sonar for in season real time management as well as data collection post season through fishing permit reports. To require further reporting of useless data would only waste the departments time and money.

Proposal 166 Establish a statewide bag limit for personal use fin fish fisheries



## OPPOSE

While this would force personal use fisherman to better utilize the fish allotted to them, it would create a mass confusion and enforcement nightmare.

Proposal 167 Require inseason reporting of subsistence and personal use salmon harvest within 5 days of harvest

## OPPOSE

This proposal is redundant. There are already methods that provide real time data giving ADFG the information needed to use their EO authority to close fisheries when the security of the resource demands it. This proposal would only represent more repetitive data for ADFG to muddle through, costing time and money while not providing any data that the department does not already obtain.

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**Proposal 82:** Support  
**Proposal 87:** Support  
**Proposal 153:** Support  
**Proposal 154:** Oppose  
**Proposal 155:** Support

**Proposal 156:** Support  
**Proposal 157:** Oppose  
**Proposal 158:** Oppose  
**Proposal 159:** Support  
**Proposal 160:** Oppose  
**Proposal 161:** Support  
**Proposal 162:** Support  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:** Support  
**Proposal 169:** Support

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**Submitted by:** Stephanie Hendrickson

**Community of Residence:** Wasilla, Ak

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose  
**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**



**Submitted by:** Delaney Hendrickson

**Community of Residence:** Fairbanks Alaska

**Comment:** I was born in fairbanks and raised north in the small town of Central.

I have been fishing in alaska from the time I was able to hold a pole.

I have fished from Kodiak up to the Yukon. I don't always get to fish in the places I'd love because I don't have the gear/means. I have been fishing the chitina dipnet area for awhile now - I would not be able to provide fish for my family if it were not for guides/services being able to assist in this fishing. I fish for the love of doing so and also for providing the best food for my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** David Hendry

**Community of Residence:** DELTA JUNCTION, AK

**Comment:** I have been dipnetting the Chitina personal use fishery since the 1980s with both family and friends. Sometimes 2 or 3 times a summer and bring back 10 or so sockeyes to smoke and can up. The reds caught in early August can be huge and processing 10 fish is a chore. Also, I am drawn to the Chitina Copper River area as a whole with its scenic and historic character.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Enjoying the privilege of having the personal use fishery in Chitina has always been a productive experience whether fish were caught or not. I can recall only one trip where salmon weren't harvested but that was a trip with kids young enough not to put them in harm's way. The Copper River is treacherous in areas and salmon can be caught with safety measures in play to minimize peril. Fishing in areas of little current is safer for children but can be with very few fish swimming there for harvesting.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

Speaking of slippery slopes, I have experienced the marvels of crawling among the drenched boulders of the Copper River banks in sideways wind-blown rain. Only the inexperienced dipnetter traveled without full rain gear in their pack. Climbing the 'cliffs' in some areas required not only stamina but ropes and sometimes 100 lb backpacks of salmon on slippery trails. My favorite spot was 2.8 miles on the ATV from O'Brien. Lots of trees to tie off and if you slipped and lost hold of the rope at least a tree or brush would catch your fall. There's a point on the river where the salmon have to swim past this point or swim up the middle or the other side of the river. I always harvested salmon there. Many memories!

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Francisco Hernandez

**Community of Residence:** fairbanks

**Comment:** Board of Fisheries comments:

Proposal 163- I am opposed to this proposal, guiding is useful and helpful to some persons.

Proposal 164- I support this proposal, guides should be subject to registration and reporting requirements, as all commercial endeavors are.

Proposal 165- I am oppose to this proposal, guides invest in equipment and their time, they should be allowed some compensation.

Proposal 166- I am opposed to a statewide bag limit, it is not a significant issue in terms of total fish caught.

Proposal 167- I am opposed to in-season reporting requirements. I fish several times during the season, in-season reporting would be burdensome and not necessary. The reporting requirements are adequate in their present form.

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Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Support  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Josie Hickel

**Community of Residence:** Anchorage

**Comment:** I am originally from Moose Pass AK and have grown up subsistence fishing in Alaska my whole life. Subsistence hunting, fishing and gathering are critical to all Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.





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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Ken Hills

**Community of Residence:** Wasilla Ak

**Comment:** It's past time to close Commercial Fishing in Cook Inlet & stop the Draggers in the Gulf from decimating further Fish Stocks!! I have stopped Sport Fishing & will continue until Fish & Game stop the mismanagement

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Durbin Hobbs

**Community of Residence:** Anchorage

**Comment:** I am an Alaskan since 1979, I rely on salmon harvested from dipnetting the Kenai and Kasilof River.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and

access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jeff Hodges

**Community of Residence:** Fritz Creek, Ak

**Comment:** One of the reasons we moved to Alaska was for the opportunity to fill our freezer with fish and game. Why would there ever be any question about protecting the rights of residents to harvest fish for personal consumption. It should be #1 above all else. Alaskans first, then sport, then commercial. How does it make sense to restrict residents and then harvest food to be shipped elsewhere? Simply if there isn't enough to support residents, then there isn't enough for a commercial fishery. (Which I don't believe is the case)

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Altagracia Hodgkins

**Community of Residence:** Anchorage

**Comment:** My name is Altagracia and I take my dad who is a US Air Force Vietnam veteran to the Copper every year to subsistence fish. I have a charter take us out as safety is priority for my dad who is 70 years old. We enjoy eating this fish over the course of the year. With a fixed income for my parents this is the best way to get the best food for them. As for me, I feed my children and have introduced them to the wonderful fish our land has given us. It also teaches them to respect the land and resources that is God given. Thank you for your time.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Karen Hoeft

**Community of Residence:** Glennallen

**Comment:** I fish in the copper river basin to feed my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Nathan Hoff

**Community of Residence:** Anchorage, AK

**Comment:** Proposal 163 and Proposal 164

I am supportive of Proposal 163 largely to reap the benefit of Proposal 164.

In regards Proposal 164, I do not see reporting as only beneficial to regulate a budding industry of commercial operators, but to have much better catch reporting and CPUE histories. I am thinking now of primarily the Kenai, Kasilof and Susitna Dip Net fisheries.

In regards Proposal 163... I am going to really draw out the Author's language where he says "Enhanced PU fisheries"

I think that this might be a very good place for the BOF to focus on whether a commercial operator would be permissible. In my mind, the "Enhanced" value a commercial operator might bring, may be, perhaps exclusively, a boat.

Thus commercial operators would have to be participating in the proscribed enhanced activity. Dipnetting FROM A BOAT on the Kasilof, Kenai, Susitna Rivers or setting a gillnet FROM A BOAT in the Kasilof, etc. Many PU fisheries would not open to enhanced activity.

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**Proposal 163:** Support With Amendments

**Proposal 164:** Support  
**Proposal 165:**  
**Proposal 166:**  
**Proposal 167:**  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Harold Hollis

**Community of Residence:** Sterling, AK

**Comment:** Dear Board,

I am a 41 year resident of Alaska with a home on the Kenai River in Sterling, AK. I recreational fish and personal use the Kenai River each and every year. Personal use fishing is extremely important to me and my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Sincerely,

Harold L. Hollis

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Randall Holt

**Community of Residence:** Wasilla, Alaska

**Comment:** We're 42 year residents of Ak. and have seen commercial fishing boats sink because they have to much onboard, yet they want to restrict how many fish us personal use fishermen can catch! Please help us out and vote these five proposals down! Thank you

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Melissa Homles

**Community of Residence:** Fairbanks

**Comment:** I am a independent Alaskan Mother, sole provider for my family and elderly mother. I drive to Chitina every year and I rely on the salmon to feed my family. I drove to chitina 4 times last year, the road was

washed out so from Fairbanks I had to go via tok. Gas was expensive. I had bo luck hiking up the trail and fishing from the rocks all day. The 4th visit I was able to go on a charter, and finally catch my limit.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Michael Hondel



**Community of Residence:** Anchorage

**Comment:** I have lived in the great state of Alaska for over 20 years, and have a great appreciation for the bounty of wild Alaskan salmon. I annually dipnet for sockeye salmon on the Kenai River, to provide healthy and wild protein for my household.

For the past 5 years, I and a group of 4 friends (all Alaskan residents, of course), have utilized a guided charter service. As a few of us are getting up in years (and have increasing issues with back pain, bum knees, hips, etc.), we appreciate the ability to participate in the subsistence fishery from a boat. The accessibility provided by a guided charter service makes sense. Further, by using local guides, I'm re-circulating money within the Alaskan economy.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

And specifically regarding Proposal 163...

"Guiding of persons engaging in personal use fisheries shall not be allowed."

..this just doesn't make sense to me. Commercialized access is not an abuse, but about improving accessibility, in some cases to folks who might not otherwise be able to participate (due to physical mobility limitations).



As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Laurie Horner

**Community of Residence:** Sterling Alaska

**Comment:** The personal use subsistence dip-net fishery is for Alaskan residents. Commercial fisherman are not necessarily Alaskan residents and even if they are, should not be allowed to interfere with the dip-net fishery for any reason.

All in all both fisheries have been adequately managed to allow ample escapement to enter home rivers and return salmon to their spawning beds, completing the cycle of mother nature that has been going on for thousands, upon thousands of years!

If commercial fishers are allowed to limit access to dip-net fishers, they are incorrectly assuming they will harvest more fish. In the long run, they will interfere with the lifecycle of the salmon, resulting in critically reduced returns of salmon to the salt water. Subsequent years will result in serious decreases in fish being able to complete their lifecycle. Commercial fishers will be out of business. Nobody wins, everyone is hurt.

I am an Alaskan resident and have been since 1977. I have participated in this fishery, purely for the reason to put food in my freezer and eat a healthy diet. This many years forward, I need this food store, as I am on a limited income and rely heavily upon the abundance of the Kenai River's

wonderful red salmon. I am blessed to be able to assign my proxy to friends that fish for me, because I am physically not able to fish for myself.

The commercial fishers intent to limit access to the dip-net, or do away with it will have a highly negative impact upon the local economy of commerce, causing more, far reaching negative consequences. They will also





be impacting the tourism industry and Alaskan residents, who simply for the joy of fishing and eating this wonderful food, sport fish at their favorite fishing hole, some on a daily basis, stocking their larders for the winter.

I resolutely oppose commercial fishing industry trying to limit access, or do away with the Alaskan residents' personal subsistence dip-net fishery.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** William Huber

**Community of Residence:** Anchorage, Ak

**Comment:** I am an Alaska resident for the past 14 years and have salmon fished with my Son every year! We rely on these fish to sustain and food requirements throughout the years. Changing the rules to support commercial fishing is stealing from us who live here year round. This is unacceptable!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.



Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Dale Hughes

**Community of Residence:** Anchorage, Ak

**Comment:** I dip-net every year to feed my friends and family. I dip-net the copper river on a charter, that river is far too dangerous to fish from the cliffs, and utilizing a charter who knows the river because they run it daily is much safer. We do not have the time to fish with rod and reel to get the daily limits and get the fish we need throughout the winter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:

Proposal 169:



**Submitted by:** Carter Hughes

**Community of Residence:** Sitka

**Comment:** Madam Chair Carlson - Van Dort and Alaska Board of Fisheries members;

My name is Carter Hughes and I am a Sitka resident and former Pelican resident. I have been working in the Alaska commercial fishing industry since 1984. Initially I worked at a processing plant in Valdez and then moved to Southeast Alaska in 1988 and started crewing on longliners and trollers based out of Pelican. I bought my first troller, the Radio, from one of Pelican's former mayors, Rubin Yost, in 1993 and began fishing the winter of 1994. I started buying small amounts of halibut IFQ in 1995. I moved to Sitka in 2000. I was on the Alaska Trollers Association Board of Directors, starting in 1995, and served for 15 years. I have been on the Seafood Producers Cooperative Board of Directors since 2014.

I support 163, 164 and 165. Subsistence and personal use fishing is for Alaska residents and is intended to be a means of supplying food for family, friends and community. It is not intended to supply monetary income. If I keep fish from my commercial catch for personal use, I forgo income so that I can have the fish for food. As a commercial fisherman, I cannot take subsistence or personal use fish for profit for myself or others. Allowing guided vessels or unguided vessels to be hired to catch subsistence or personal use fish creates a commercial fishery in a fully utilized group of fisheries resources.

I have witnessed the explosive growth of lodges, guided and unguided vessels in the areas where I fish, primarily north of Sitka, especially in the Yakobi Island, Cross Sound, Icey Straits area. That is it's own problem, and allowing these commercial services to harvest fish for subsistence or personal use will create an unhealthy economic incentive that will stress the already fully utilized fisheries resources. Further, I don't see that encouraging the lodges, guides and unguided services to engage in subsistence and personal use fishing for profit meets the definition of customary and traditional use. If anything, it will lead to the destruction of subsistence and personal use fisheries. Please vote to pass proposals 163, 164 and 165.

Thanks for your hard work and the opportunity to testify.

Carter Hughes

Sitka

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Proposal 163: Support

Proposal 164: Support  
Proposal 165: Support  
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Proposal 167:  
Proposal 168:  
Proposal 169:



**Submitted by:** Robert Hunter

**Community of Residence:** Wasilla Alaska

**Comment:** I like charters boats because I don't want to own jet boat to work it only twice year. One other most charter companies have multiple boats in the area that's safety in numbers. If one breaks down the can send one of the other boat to help safety in numbers. If the state ban charters in one fishery but not in other fisheries that would be considered discrimination across the broader picture you can't target one and not the other.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Steven Huston

**Community of Residence:** Palmer, AK



**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:

Proposal 12:

Proposal 13:

Proposal 82:  
Proposal 87:  
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Proposal 156:  
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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jaclyn Huston

**Community of Residence:** Palmer, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jessica Hutchings

**Community of Residence:** Palmer, AK

**Comment:** We gosh to feed my family and teach my children to appreciate the earth and all it gives us. We fish in prince william sound, kenai river, and susitna river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Rod Hutchings

**Community of Residence:** Anchorage Alaska

**Comment:** We go to the copper river annually to subsistence fish and help supplement our food supply. We usually go with 3 or 4 other people who go for the same reason.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Kimberly Hutchings

**Community of Residence:** Talkeetna

**Comment:** Hi, I am a 24 year resident of Alaska , head of household, and supplement my source of food for my family with dip netting salmon on the Chitna river. It is critical to the health and food supply for my family. Have been fishing with Ryan Ford, for several years. He is extremely respectful, an advocate for maintaining sustainable values, so there will be a sustainable harvest for the future of all Alaskans and beyond. He used a very small boat and adheres meticulously to all protocols supporting native land and subsistence fishing laws, which serves Alaska residents . Please consider the individuals who spend effort and time to live off the land and resources, sustainably,. Commercial fishing is raping our oceans at an extreme and unsustainable rate. We are individuals, supporting Alaskans, who support Alaskans, and would like to continue to eat healthy fish provided by the beautiful chitna river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to inequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Will Hutt

**Community of Residence:** Homer, AK

**Comment:** China Poot creek every summer for the last 29 years (occasionally Kenai River and Copper River District

Helped feed the family as children were growing up and I continue to smoke fish for winter months

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Charlene Ihly



**Community of Residence:** Anchorage, Alaska

**Comment:** I am originally from the the Yukon-Kuskowim area. I now reside in the Southcentral region. Fishing has always been a part of my life. It is my staple and a nutritious healthy choice of food. I cannot imagine life restricted from accessing this way of life. As an Alaskan Native who honors the legacy of our rich culture, to take away and destroy what is all we have is only demeaning who we are as a people of the land and waters. I use the dip netting method when I can and only take what is needed. I go with family because that is my tradition. We survive from this means of resource. Most importantly it is cost saving. With the rise in food prices, how does the government expect us to survive? Don't restrict us from all we have left. It will be putting us into extinction.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Joshua Isenga

**Community of Residence:** Anchorage, AK

**Comment:** I fish with my family on the Copper, Kenai, Kasilof and Russian Rivers. We use dipnet fishing for stocking our freezer for the winter. I have used guide services but typically dipnet from the shore.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen. Again, none of these proposals touch the root of the problem and are a smokescreen to the real issue of commercial fisherman over fishing the local Salmon stocks and taking this important resource from Alaskans.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Joel Jackson

**Community of Residence:** Kake Ak

**Comment:** This is not my area but it does say , all Alaskans, so I'm from Southeast Alaska. If these commercial fishermen can do this in that region then it will open up other lawsuits in other areas. The

commercial fishermen have always got a bigger piece of the pie, the subsistence users get like one percent of the pie. So I oppose this proposals.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Kim Jackson

**Community of Residence:** CHUGIAK

**Comment:** My family and I dipnet on the Kasilof/Kenai River and have for more years than I can count. This is our primary food for the winter to feed our family. We vehemently oppose proposals 163-167. Once you take our way of life away in one place, it will only migrate in and you'll soon take everything away and only allow commercial fishermen to profit off of our loss.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Francis Jeffries

**Community of Residence:** Anchorage, AK

**Comment:** I am writing to oppose proposals numbered 163, 164, 165, 166, and 167. I am a 70 year old man who has fished the Kenai river since 1995 and the Copper river on a less frequent basis. In that time access to fishing has been adversely impacted by both commercial fishing and guides. Commercial openers now make it so that it is difficult or impossible to time my arrival at the Kenai river to have a decent chance at success.

The guide situation is out of control on the Kenai in that since the crash of the King fishery they have gone after reds and taken over every place I used to fish. They communicate with each other using radios so that as one boat leaves another comes in and fills in where the first boat's clients were fishing. They also disregard the time limits on when they can be on the river so that it is virtually impossible to get on the river to a good spot before they do. This is happening on both the upper and lower Kenai.

It is because of the above that I have adopted dip netting as my primary means of acquiring fish now. It is safer and, while I do not prefer it to hook and line, it is productive enough that I can still fill my freezer. I do not feel safe hanging off a cliff at the Copper River or standing in the deep water with the fast current I am forced to be in because of over-crowding by the guides on the Kenai. Dip netting allows me that access to the shared resource of salmon in a safe and practical way. My entire family now dip nets every summer and taking access to the Copper river and/or the Kenai dip netting opportunities would deny us access to the salmon we have enjoyed for 27 years. I never imagined that this would be happening here in the "Last Frontier". It seems that if the commercial fishers had their way we would all be forced to fill our freezers at the grocery store rather than the river.

Access to hunting and fishing is a big part of what makes the Alaska experience so great. The proposals are self-serving for the commercial fishing people and do not serve the interests of the Alaskan public at large. Please do not allow proposals 163-167 to pass.

Sincerest regards,

Frank Jeffries

I am a 70 year old fisherman who has bank fished since 1995 and now uses charters to gain access to fishing. It is not safe for me to fish from the cliffs at the Copper River so a charter is the only practical way for me to access this resource safely. I fish the Kenai River and the Copper River. I used to use hook and line on the Kenai for years until the king runs crashed and the guides took over every decent place to fish. I have been crowded out of the place I had fished for 25 years by aggressive guides that tag team by taking over the best areas and use radios to inform each other when their guests are about done so that one guide boat full of tourists

leaves and another immediately takes all the spots. This is a problem on both the upper and lower Kenai. It has gotten so that the guides and commercial fisherpeople seem to own the river instead of it being a shared resource.

I raised my kid fishing of the river and I got my wife back fishing. We feed ourselves by stocking the freezer each year. That is one of the great things about living here and now it seem you want to take that away too. I really don't want to buy fish in a store. Please do not allow proposals 163-167 pass. If you do it will most likely be the end of fishing for me.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and self-serving for the commercial folks.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and create inequitable access to a shared resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

Access to fishing and hunting opportunities is one of the things that makes Alaska a great place to live. Restricting access is not the Alaska way and I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Brian Jennison

**Community of Residence:** Glennallen

**Comment:** These proposals are a attack on Alaskans ability to access fisheries to feed their families . The Copper River Fisheries would be severely limited to accessible spots overcrowding and causing people to pick dangerous spots.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and

access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** David Jerry

**Community of Residence:** Delta Junction

**Comment:** I am a long time resident of Alaska and have dipnetted in the Copper river near Chitna for 40+ years, and depened on the salmon to supply me food through the winter. I have always used the guided charters when available because its so much safer for me as im in my 70s now and cant traverse down dangerous slopes to get to the fishing hole or wade up to my waste in swift waters. The guides put me in a safe place and always check on me during my fishing time. With out them I would not be able to get my winters substanance.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Keith Jewell

**Community of Residence:** Palmer

**Comment:** I have a family of 5 and we use fish from dipnetting to live on. It's a major part of our life.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Mark Johannes

**Community of Residence:** Anchorage, Alaska

**Comment:** I have been in Alaska for 58 years and have hunted and fished my entire life. I have used the personal use fishery for my family and it has provided fish as a primary source of food. To restrict this and take away my way of life and food source so they can put money in the pockets of a few is not fair. I oppose these restrictions/bans to support a commercial fishery that isn't interested in sharing or appropriate management of the resource. They want it now and don't care about the future of these resources which are here for ALL Alaskans, not just a few.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** James Johnson

**Community of Residence:** Soldotna, Alaska

**Comment:** I am a retired Kenai River fishing guide. I guided sport fishing anglers on the Kenai River for over 40 years. I saw the "glory days" of salmon fishing on the Kenai River in the late 1970's to the 1990's. I saw the salmon resource dwindle down over the decades as it did in the 1950's to the 1960's in Cook Inlet. Human greed is a difficult problem in fisheries management. Limited Entry was started in 1972 to control the commercial salmon harvest by a limited amount of permit holders fishing two days a week. When ADF&G allowed "emergency fishing periods" over-harvest took place in so many years. So now we must again, rebuild salmon stocks because we cannot control human greed. Alaskans are not the problem by using dip nets for personal use salmon fishing. Gill nets left in the water too many days and hours are the problem!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Haakon Johnson

**Community of Residence:** Anchorage

**Comment:** I'm a lifelong Alaskan and I fish all over the state. I fill my family freezer by dipnetting on the Cooper River. I can't believe we are even discussing limiting Alaskans ability to fish and Dipnet and feed our families.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed





their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 157:**  
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**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Donald Johnson



**Community of Residence:** Soldotna Alaska

**Comment:** I Opposed Proposals 163, 164, 165, 166, 167 & 168.

It is unbelievable that commercial fishermen would create Board of Fisheries, BOF proposals that attempt to ban their neighbors from accessing the same common use fisheries resources they are accessing themselves. Are public fisheries individuals then suppose to write proposals to ban commercial fisheries from accessing these same fisheries resources? Is this the actual mission of the Alaska Board of Fisheries? Commercial fisheries write 100 proposals to shutdown sport fisheries and sport fisheries write 100 proposals to shut down commercial fisheries? The BOF then spends most of its time deleting away 99% of those proposals while our fisheries decline year after year? Has any BOF member ever actually considered how much better Alaska's fisheries would be if BOF members took all that wasted energy and time and put it into researching what is actually killing our king salmon?

The Alaska Board of Fisheries needs two Boards. One Board that manages user group conflicts and one Board that manages Alaska's many fisheries resources. Having a single Board of Fisheries trying to manage both fisheries and user group conflicts at the same time would be like trying to get the Federal Aviation Administration to also handle Transportation Security Administration safety responsibilities. If the FAA and TSA were combined together, neither agency would be able to carry out their current responsibilities. Combining fisheries management with user group management together assures us that both problems will never be handled correctly.

I claim the Alaska Board of Fisheries should be managing only fisheries resources and not user group conflicts. I request that the BOF ask the Alaskan Governor and Legislature to draft legislation to generate a separate Fisheries User Conflict Board to regulate fisheries conflicts and retain Alaska's current Board of Fisheries to specifically manage only real fisheries resource issues.

Proposal's 163 - 167 are all user conflict proposals and generate purely to allow one user group to win more fisheries access while causing another to lose it.

163, 164 and 165 attack guided users to benefit commercial users. Proposal 166 attempts to attack personal use fisheries to benefit commercial fisheries by incorrectly claiming Alaska lacks statewide annual personal use bag limits. The proposal makes this claim even while personal use permits contain an annual personal use bag limit matching the number of persons in their household. 166 makes bag limit problem claims that are false. The only reason for these false claims is user conflicts that shouldn't even be considered by a board looking to manage the health of the fishery.

Proposal 167 attempts to claim that the current end of season reporting for personal use or subsistence fisheries (isn't good enough). The proposal desires to force in season book keeping to destabilize these fisheries anyway they can. Any such in season reporting should also be forced onto commercial fisheries to see if their records match statewide fish ticket data.

Proposal 168 attempts to do the same by having the adfg be able to close off sport fishing because of unsafe levels of polyfluoroalkyl. Why not also close off commercial fisheries for unsafe levels of polyfluoroalkyl? Why only hook and release sport fisheries? This proposal came from the adfg which means even the adfg is attempting to abuse the fisheries management of the BOF by attacking individual user groups when unsafe levels of polyfluoroalkyl should effect all user groups. The reason the adfg doesn't include all users groups is because proposal 168 is an adfg user group attack that is also attacking the BOF ability to manage Alaska's fisheries.

All of the above proposals are specifically designed to allow one user group to attack another user group by creating proposals against the other side while wasting our BOF ability and time to effectively manage Alaska's fisheries. Do you wonder why managing Alaska's fisheries is getting so difficult? It's because you are welcoming user conflict to be mixed into managing the health of our fisheries.

Please vote NO on all of these user conflict proposals 163 -168 and establish a separate Fisheries User Conflict Board because Alaska's fisheries would be healthier if you did.

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As an Alaskan, I claim to have a Constitutional right to access personal use and subsistence fisheries bother privately and commercially.

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Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If 163 & 165 pass, I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition to participate in this harvest and I take pride in my ability to be a provider.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Please do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibit guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen. Why would any sane person want to stop Alaskan residents from being able to access Alaska's fisheries resources?

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Thank you,

Donald Johnson

36160 Schultz Street

Soldotna, Alaska 99669

donaldjohnson@alaska.net

907 953 9500

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Dear Alaska Board of Fisheries Member,

I would like to specifically address proposal 163 which incorrectly attempts to claim that "public fisheries access through commercial fisheries by charter boat of an Alaska personal use fishery is incorrect because personal use access was not intended to be commercialized by common users within a personal use fishery."

I claim the drafter of proposal 163 is confused by the many uses of the word "commercial" with regard to Alaska's fisheries.

Alaska attempts to define commercial fishing within AS 16.05.940 where it states "commercial fishing is "the taking, fishing for, or possession of fish, shellfish, or other fishery resources with the intent of disposing of them for profit, or by sale, barter, trade, or in commercial channels." Alaska also states that a "Commercial fishermen" is defined by "anyone onboard a licensed fishing vessel who is directly or indirectly participating in the taking of fish."

These may be commercial fishing definitions as attached to Limited Entry fishing but charter boat operators are part of Alaska's common user group (different method and means) and thereby guaranteed both commercial and private fisheries access outside of the Limited Entry Act.

All of Alaska's common fisheries resources have a Constitutional access guarantee for both commercial and private common access outside Alaska's 1972 Limited Entry Act. Alaska Commercial fisheries regulations

cannot be applied to Alaska common users because commercial common users may be restricted within their individual methods and means (no exclusive right clause) but they cannot be restricted (or protected) by the Limited Entry Act. You would also need substantial evidence of a resource or user group problem to create a new “commercial common user exclusive fisheries right”. Lacking such evidence would render regulating a commercial common users group unconstitutional.

This means an Alaska Limited Entry commercial fishing “Exclusive Right” is Constitutionally protected by the Limited Entry Act but Alaska Common Use commercial fishing is NOT.

This kind of change would restrict Common Use commercial fishing and thereby create “an exclusive right or class” within those remaining Common Use commercial fishermen. That new commercial common user class would NOT be protected by the Limited Entry Clause because it’s a different method and means.

Restricting a common user without substantial evidence of a resource or user group problem would create an exclusive fisheries right and that would eventually render restricting Common Use charter operators unconstitutional. B. Section 15: the "No Exclusive Right" Clause.

I am claiming that the Alaska Common Use Clause makes NO distinction between personal or professional fisheries access. Personal and Commercial common use fisheries access is 100% guaranteed outside of Limited Entry and you would need substantial evidence to restrict those commercial common users.

The drafter of Proposal 163 appears to be confusing “Limited Entry commercial references” with “common user commercial references”. The drafter also fails to provide substantial evidence of a problem to resolve other than his personal belief that personal use fishing cannot be commercial.

I claim it is obvious that the Alaska Constitution expected commercial Common Use of personal use fisheries therefore the Proposal 163 request to remove it is completely illogical. Limited Entry commercial fisheries references cannot be used to create a new and unconstitutional “Limited Entry Common Use Commercial Fisheries Class” without substantial evidence of a serious resource or user group problem and 163 does not list any such problems.

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Owsichuk, 763 P.2d at 496. Alaska's public trust responsibility to manage wildlife is comparable to its obligations under the "public trust doctrine," where the state has a trust duty to protect the public's right of access to certain lands and navigable waters for certain purposes.

In *State v. Ostrosky*, 667 P.2d 1184 (Alaska 1983), we noted that there is a tension between the limited entry clause of the state constitution and the clauses of the constitution which guaranty open fisheries. [Citing sections 3 and 15 of article VIII] We suggested that to be constitutional, a limited entry system should impinge as little as possible on the open fishery clauses consistent with the constitutional purposes of limited entry, namely, prevention of economic distress to fishermen and resource conservation.

In *CWC Fisheries v. Bunker*, 755 P.2d 1115, 1121 n. 14 (Alaska 1988), we noted that the public trust doctrine guaranteed fishermen access to public resources for "private commercial purposes" as well as for recreation. The same rationale applies to professional hunting guides under the common use clause. The common use clause makes no distinction between use for personal purposes and use for professional purposes.

Admittedly, there is a difference between commercial fisherman and professional guides: a commercial fisherman takes his catch himself before selling it to others for consumption, while a hunting guide does not actually take the game, a privilege reserved for the client. We view this as an insignificant distinction that does not remove professional hunting guides from protection under the common use clause. The work of a guide is so closely tied to hunting and taking wildlife that there is no meaningful basis for distinguishing between the rights of a guide and the rights of a hunter under the common use clause.

<https://casetext.com/case/owsichuk-v-state-guide-licensing-1>

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Section 15 of article VIII provides:

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for the purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood and to promote the efficient development of aquaculture in the State.

Section 17 of article VIII provides:

Laws and regulations governing the use or disposal of natural resources shall apply equally to all persons similarly situated with reference to the subject matter and purpose.

<https://law.justia.com/cases/alaska/supreme-court/1989/s-2732-1.html>

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Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** Richard Johnson

**Community of Residence:** Kenai, Alaska

**Comment:** I have been eating Alaskan wild caught salmon for 67 years. Currently putting Kenai reds in the freezer via the personal use dipnet fishery. I fish with extended family and friends.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Kim Johnson

**Community of Residence:** Kenai, AK

**Comment:** We fish the Kenai River personal use dipnet fishery with family and friends.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** David Johnson

**Community of Residence:** Anchorage Alaska

**Comment:** Sounds like some want to get more fish for themselves, which I wonder how many pushing for this are out of state people because the commercial fishing industry has some out of state people working in it. If anything, we should see a change in fee for non Alaskans looking to do commercial fishing in our waters.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

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Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** John Johnson

**Community of Residence:** Chugiak

**Comment:** I fish with my father and friends from childhood. We all grew up in Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Christopher Johnson

**Community of Residence:** Soldotna, AK

**Comment:** As a lifelong Alaskan, I have planned on, with great passion, working back into the family fishing ranks to be a productive member committed towards contributing what I can through any and all responsible, ethical, moral, legal, and safe fishing practices possible in order to continue on what has been a long standing family tradition. Dipnet fishing is what has truly helped as I have learned time and time again through my family members before me as well as through others all over this great state we call home, wherever it is we all fish in this great state. As a true Alaskan who appreciates great Alaskan traditions, I would love nothing more than to be just one more to be able to continue on with one great and amazing tradition that is in place to help keep families going, especially through these tough economic times we are in.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 82:  
Proposal 87:  
Proposal 153:  
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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Rodney Jones

**Community of Residence:** Anchorage

**Comment:** For 25 years I was a guide on the lower Kenai, in all the time I have spent on the River the perception IS the Kenai is managed for maximum output red salmon to benefit commercial fishermen. Will this ever change????

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kendra Jones

**Community of Residence:** Anchorage Alaska

**Comment:** Setnet subsistence Kasilof

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 159:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Warren Jones

**Community of Residence:** Anchorage, AK

**Comment:** Considering that commercial fishermen already account for something like 98% of the fish take in Alaska I don't understand why they are always so concerned about the relatively small take that personal use and subsistence account for. More than anything this makes it clear they represent their own interests rather than of all Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kurt Jones

**Community of Residence:** Cordova

**Comment:** see attached (*NOTE: no attachment was included with this comment*)

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Proposal 165:  
Proposal 166:  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Thomas Jordan

**Community of Residence:** Sutton, Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:

**Submitted by:** Anthony (Sean) Jordan

**Community of Residence:** Wasilla

**Comment:** Hello I am the president of a non profit that focuses on youth from low income and marginalized communities ([www.wakeinc.org](http://www.wakeinc.org)). We teach our kids the Alaska way of substance fishing and bringing fish home to their families. The Cooper River provides an excellent fishing opportunity to do so with our kids. We are planning to use a charter to assist with this excursion. Please allow the substance fish opportunities in chitna to remain open. Regards Sean Jordan, President WAKEINC.ORG.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Tom Jordan

**Community of Residence:** glacier view, AK

**Comment:** continue to allow Alaskans to dipnet salmon on the Copper River at at least the same rate as last year. Allow at least one king salmon. if the king catchage must be reduced, requie manning fish wheels above the bridge, with the freeing of their king salmon.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Eric Jordan

**Community of Residence:** Sitka, Alaska

**Comment:** Dear Chair Carlson-Van Dort and Board of Fisheries members:

I have been an Alaska resident for over 73 years. I was born in the rural community of Wrangell in 1949 and grew up poor living off the land, beaches, and marine waters. What has been labeled "subsistence or personal use" in recent years we considered a way of life. I have been involved continuously since 1973 as either an elected or appointed representative of user groups as diverse as subsistence (including a term on the SERAC) sport fishing (I helped found two SE sport fish groups and have been a weigh station for the Sitka Sportsmen's Association annual king salmon derby for over 35 years) commercial trolling (I am currently an elected troll representative on the NSRAA Board) and conservation (I served over 20 years on the Sitka Conservation Society Board). As my father did before me, I have also worked briefly as a guide. I have had the great honor to be asked to facilitate the problem solving and proposal development of two notable subsistence projection plans in the

Sitka Area. Our Local Area Management Plan (LAMP) for halibut, and the national award winning Redoubt Lake Sockeye Management Plan. I have also served briefly on the BOF and 8 years on the AP to the NPFMC.

I SUPPORT proposals 163, 164, and 165. I voted for these along with the unanimous position of our Sitka AC but feel so strongly that I am adding my personal perspective. Between the unlimited sport fish guiding and bare boat rental charters we are increasingly dealing with challenges to keep these fisheries within sport fish

allocations between commercial, personal use, and subsistence interests in SE Alaska. Just last night our AC heard a presentation from ADF&G Sport Fish Staff about plans to deal with sport fish overages in the Sitka Area on Ling Cod and Pelagic Rockfish (mostly black rockfish). I have also read fellow Sitka AC member Tad Fujioka's comment and agree totally with his well written passionate letter so will keep my comments brief.

BOF members: However you do it, it is my humble opinion you must gain control of both the guided and bare boat rental fisheries. Those of us who have lived all over SE Alaska like I have (Wrangell, Ketchikan, Petersburg, Juneau, and Sitka plus decades fishing out of places like Elfin Cove and Port Alexander) know that guiding for personal use and subsistence harvest is not customary or traditional. We commonly take friends and family sport, personal use, subsistence fishing, or share fishing spots and harvests but we don't charge for it.) Just this week I provided information on where to set a halibut skate in Sitka Sound for subsistence halibut.

It is customary and traditional to share subsistence and personal use harvests, knowledge, and experiences. Charging for them beyond the cost sharing already allowed is not "customary or traditional." Please pass 163, 164, and 165 to make this perfectly clear.

Sincerely,

Eric Jordan

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Proposal 163: Support

Proposal 164: Support  
Proposal 165: Support  
Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:

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**Submitted by:** Brad Jorgensen

**Community of Residence:** Wasilla

**Comment:** I am a father of 5, using a charter is the safest way I can provide food for my family. As a medevac pilot I have rescued multiple people who have put themselves in harm's way. I feel fish should not be one of those situations.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition to participate in the harvest and I take pride in my ability to be a provider.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Cheryl Julsen

**Community of Residence:** Wasilla

**Comment:** I haven't sport fished the last few years, due to health. However I love fishing Seward when lucky enough to go. I also fish the rivers in the Mat Su. It an enjoyable activity I can afford. And the only fish I consume because I can not afford to purchase salmon in the store. The fishing industry has the largest piece of the pie already. Enough is enough.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Eric Kahle

**Community of Residence:** Colorado Springs, Colorado

**Comment:** I was a long time resident of Alaska, and currently own property in Soldotna off Funny River Road. I return every summer to fish for Salmon with the family. I currently live in Colorado, and will retire to Alaska. My family fishes the Kenai river every summer, because it is what our family loves to do!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Alan Kapp

**Community of Residence:** Bellingham, WA

**Comment:** Proposal 154 - Opposed

I am opposed to proposal 154 which will allow drums or net reels used in purse seining. There is no need for this regulation change after 70 some years of denying drum seining in Alaskan purse seining.

Proposal 157 - Opposed.



## Proposal 158 - Opposed.

These two proposals both ask for the multiple area permit holders to be allowed move from one fishing area to another fishing area within the same year. If adopted, these proposals will just add additional fishing effort to the less profitable fisheries. Bristol Bay fishermen don't need to be additional competition to the Kodiak salmon fishery after the Bristol Bay fishery is finished.

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Proposal 157: Oppose  
Proposal 158: Oppose  
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Proposal 161:  
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Proposal 167:  
Proposal 168:  
Proposal 169:



**Submitted by:** Eric Kay

**Community of Residence:** Fairbanks, AK

**Comment:** I'm a Fairbanks resident I've been going to Chitina since 2014 and I've been doing it the hard way, never been on a charter.

Hem charters has monopolized the entire parking lot area, they have a leaky fuel truck that is always there parked right by the river, and they have a fish filleting station that takes up about 10 parking spaces, they need to go. Every year I go to Chitina there's more and more boats, run by lower 48ers, hauling people out to take fish, and they have turned the parking lot into a trash dump; they need to go! Chitina will reach a natural equilibrium when it stops being inundated by people who would not otherwise fish. Plus, it's illegal to sell personal use salmon, so why isn't it illegal to make a fortune off of hauling people out on the river? How much to these charter company's pay in remittances to the state, prolly little to none. It's a false argument to say that low income people are reliant on the charters, that is not the case low income people are on the banks, tied off with nets, earning their fish.

There's too many fish being taken because out of state charter companies overloading the river banks. These people pay little to no remittances to the state, and the parking lot has turned into an oil soaked junk yard because of hem charters.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** William Keller

**Community of Residence:** Soldotna

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Olin Kelliher

**Community of Residence:** Eagle River, Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
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<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Mike Kemming

**Community of Residence:** Soldotna

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Dennis Kempen

**Community of Residence:** Wasilla

**Comment:** I go with my family and attempt to get our limit in the hopes of feeding our family. This has never been more important to us as inflation and high cost of living in Alaska has hit us hard. I have dip netted at Kenai but due to high cost of gas will probably focus on fish creek. Please do not allow commercial fishermen to change our limits at any locations. Not only is it food for us but also a family and social event.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Doris Kempen

**Community of Residence:** Wasilla

**Comment:** I like to fish with my family at Kenai and Fish Creek in order to fill our freezer and can reserves for emergencies. With times of high inflation it has never been more important to maintain our current limits or raise them.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** David Kempen

**Community of Residence:** Wasilla

**Comment:** I like to fish with my family at Kenai and Fish Creek in order to fill our freezer and can reserves for emergencies. With times of high inflation it has never been more important to maintain our current limits or raise them. Due to my health I do not have a job and the fish is a main part of my daily diet.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



February 24, 2023

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

RE: Statewide Finfish and Supplemental Issues meeting March 10-14, 2023

Dear Chairman Carlson-Van Dort and Members of the Board of Fisheries:

Kenai River Sportfishing Association (KRSA) is a professional 501(c)3 nonprofit dedicated to ensuring the sustainability of the world's premier sportfishing river -- the Kenai. KRSA's area of responsibility encompasses the Kenai River watershed, greater Cook Inlet Basin, and Alaska. Since 1984, the Association has been a leading advocate for fisheries conservation in Alaska, working diligently to ensure Alaska's recreational and personal use fishery rights are protected and the fisheries are healthy for generations to come.

**Addressing the supplemental issues:**

**Nushagak King Salmon Stock of Concern Draft Action Plan – Support.**

KRSA strongly supports the designation of Nushagak River king salmon a Stock of Management Concern and the subsequent adoption of an Action Plan to address this serious situation.

After careful review of documents still in draft form, KRSA conditionally supports the adoption of the management elements suggested by the Alaska Department of Fish and Game (Department), particularly the Optimal Escapement Goals (OEG's) for Nushagak and Wood River sockeye salmon. What concerns KRSA about what we have seen so far in draft is that the "bottom line" management objective for king salmon remains vague and that most or all the protection suggested occurs during first two thirds of the king salmon run timing at Portage Creek leaving the latter third, where quality of escapement is highest, potentially without adequate protection.

In addition, KRSA strongly supports the development of more selective harvest strategies for the commercial fishery to include those strategies suggested in the draft action plan working with time, area, and gear.

**Addressing the Statewide Finfish Proposals #163-#167:**

**KRSA opposes Proposals #163, #164, #165, #166, and #167 in the strongest terms.** Each of these proposals is, in its own way, intended to chip away at the opportunity that Alaska's residents have to harvest salmon through their participation in Alaska's personal use and subsistence fisheries. The



problem statements provided by the authors of these five proposals are spurious and do not come close to rising to the level requiring regulatory relief. The Department has not submitted any proposals seeking regulatory relief that the authors of proposals #163-#165 seek. KRSA subsequently suggests that all five of these proposals be summarily rejected rather than enabling this thinly veiled allocative agenda from being pushed on all Alaskans.

**Proposal #163 – Opposed.** This proposal seeks to prohibit guiding in personal use finfish fisheries as follows...

The Department's comments will show opposition to this proposal. Department data indicates that there might be less than 10 commercial operators who charge for transporting or guiding Alaska residents in personal use fisheries across the State. Other than the author's own value laden bias against harvest of salmon by Alaska residents, there is no problem statement associated with this proposal. KRSA does not believe that there is a problem here, certainly not one that requires regulatory relief. If adopted this proposal would effectively reduce Alaska residents' opportunity to put fish in their freezers.

**Proposal #164 – Opposed.** This proposal seeks to establish registration and reporting requirements for personal use guides and transporters as follows...

Department data indicates that there might be less than 10 commercial operators who charge for transporting or guiding Alaska residents in personal use fisheries across the State. Other than the author's own value laden bias against harvest of salmon by Alaska residents there is no problem statement associated with this proposal. KRSA does not believe that there is a problem here, certainly not one that requires regulatory relief. The Department has far better uses for their limited funding, uses that address the sustained yield of fishery resources.

**Proposal #165 – Opposed.** This proposal seeks to prohibit compensation for guide services in subsistence fisheries as follows...

Other than the author's own value laden bias against harvest of salmon by Alaska residents, in this case those Alaska residents with a statutory priority for the harvest of salmon, there is no problem statement associated with this proposal. There is not a problem here that addresses a sustained yield issue, an orderly fishery issue or an economic issue. There are all sorts of things wrong with this proposal, not the least of which is that it is unnecessary and unenforceable.

**Proposal #166 – Opposed.** This proposal seeks to establish a statewide bag limit for personal use finfish fisheries as follows...

What possible constitutionally consistent fishery management objective does this proposal seek to achieve? KRSA would suggest the answer to that question would be, "none". The author's justification seems to be, "since there is an annual limit for the taking of blacktail deer there should be an annual limit restricting the harvesting of salmon by Alaska residents." The Alaska Department of Fish and Game will comment in opposition to this proposal in detail. KRSA agrees with the assessment of the ADFG.





**Proposal #167 – Opposed.** This proposal seeks to require in season reporting of subsistence and personal use salmon harvest within five days of harvest as follows...

KRSA asks, “Are there any fishery management objective anywhere in the state that are not being met due to the current reporting requirements found in regulation?” KRSA would suggest the answer to that question would be, “none”. The Alaska Department of Fish and Game will comment in opposition to this proposal in detail. KRSA agrees with the assessment of the ADFG. In addition, implementing new and unnecessary reporting requirements only serves to discourage participation and increase administrative costs. The authors of this proposal know that this is the case, and it is likely the true reason behind this proposal.

**Addressing the remaining Statewide Finfish Proposals:**

**Proposal #87 – Support**

**Proposal #153 – Support**

**Proposal #82 – Support**

**Proposal # 154 – No Position.** KRSA does not have the expertise to make a meaningful comment on this proposal.

**Proposal #155 – Support**

**Proposal #156 – Support.** While KRSA both understands and supports this proposal we do ask if the language is sufficient to address the wearing of felt soled footwear while personal use fishing from a boat in freshwater? We believe that this needs to be clarified so that enforcement can be effective.

**Proposal #157 – No position.** KRSA does not have the necessary data to evaluate this proposal and take a position currently. KRSA reserves the right to take a position during the meeting as the proposal is discussed.

**Proposal # 158 – No position.** KRSA does not have the necessary data to evaluate this proposal and take a position currently. KRSA reserves the right to take a position during the meeting as the proposal is discussed.

**Proposal # 159 – Oppose.** KRSA sees no reason to adopt a regulation such as this proposal seeks. If conditions in a fishery warrant, the Department has the authority to implement concurrent closures.

**Proposal # 160 – Oppose.** KRSA sees no reason for the Board of Fisheries to address this issue in regulation.



**Proposal # 161– Support.** KRSA believes that good policy supports sustainable fisheries.

**Proposal #162 – Support.** KRSA believes that the Department’s justification for adopting this proposal makes good sense.

**Proposal #168 – Support**

**Proposal #169 – Support**

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Proposal 87: Support  
Proposal 153: Support  
Proposal 155: Support  
Proposal 156: Support  
Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161: Support  
Proposal 162: Support  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168: Support  
Proposal 169: Support

**Submitted by:** Ryan Kennedy

**Community of Residence:** Anchorage, Alaska

**Comment:** I was born in Alaska and have been fishing in Alaska for decades. Every year I dip net on the Kasilof in order to help feed my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most commercial fishermen don't even live in Alaska. Their interests should be put last. Subsistence and personal use should be given priority in fishery management.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them

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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Kevin Kerr

**Community of Residence:** Kenai Alaska

**Comment:** Dipnetting provides the most benefit to the most number of Alaskan, which is exactly what our state constitution mandates. The statewide commercial catch already accounts for the vast majority of fish harvested, with the benefits going to a very few individuals and businesses, many of whom are not even residents of Alaska. The proposals to restrict or ban dip netting are outrageous. Please take a stand for the citizens of Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Frances Kettering



**Community of Residence:** Clear, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Monte Kiggins

**Community of Residence:** Anchorage, Alaska

**Comment:** I am a father of 5 children that were raised on salmon, halibut moose and caribou. Fishing on the Kenai river was a life saver for my family because the salmon was so plentiful. Now all my children are grown and raising their own families and we all fish as a family on the Kenai river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kimberly Killion

**Community of Residence:** Anchorage

**Comment:** I have lived and worked in Alaska 41 years and very opposed to the 5 proposals from commercial fishermen. We have fished the Kenai River for the past 40 years. We fell in love with the area and purchased property so we could enjoy the opportunity to fish and enjoy our lives.

Over the course of our years we have provided for individuals who are 80 years of age and cannot fish. Via the proxy permits, it allows them to enjoy the rewards of something they physically can no longer attempt and is food for their table.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Thank you for your time and consideration.

Kimberly Killion

8641 Barney Circle

Anchorage, Alaska. 99507

kimmerscache@gmail.com

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
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Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Matthew King

**Community of Residence:** Palmer, AK

**Comment:** Dipnetting is an integral way of life of harvesting a protein source that our family fully uses throughout the year. None is wasted! We are careful to not harvest more than our family can benefit from for the year. It's an important event to teach the next generation to protect and respect the fish population by actually participating in dip netting, not just reading about it.

Using a charter for dip netting also allowed my wife to participate when she broke her foot and when she was pregnant. Without the charter, she would not have been able to participate. Having six people on a single charter boat also meant there were less boats on the river. Without the charter, there could have been three extra boats on the river that day. One for each family. The charter was also informative on what we could do to protect the health of the fishery.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and



access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Kevin King

**Community of Residence:** AK-WA



**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Mike Kinney

**Community of Residence:** Soldotna

**Comment:** We fish for winter food

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
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<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Sid Kinney

**Community of Residence:** Sitka, Alaska

**Comment:** I support 157.

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Proposal 167:  
Proposal 168:  
Proposal 169:

**Submitted by:** Matt Kinney

**Community of Residence:** Sitka, Alaska

**Comment:** To whom it may concern,

My name is Matt Kinney, and I am writing to express STRONG SUPPORT FOR PROPOSAL 157. I am a career commercial fisherman living in Sitka, Alaska but have taken part of many fisheries across the state over the years and currently own and operate two vessels that individually take part in multiple fisheries. Our two boats try to stay busy in the summer months by participating in the Sitka sac roe herring fishery, federal and state southeast alaska sablefish fisheries, Bristol Bay gill net fishery and southeast salmon seine fishery, but as written, Alaska state statute will not allow an enterprising fisherman the right to hold permits as a salmon seiner, and a drift gill netter in a separate part of Alaska in the same year, even on a separate and completely differently equipped vessel, although currently that same fisherman may be hold and use a permit as a seiner, a gill netter or a troller within the same region of alaska on the same boat.

Over the years we have been forced to diversify to spread risk in an industry that can be volatile in both ecology and economics, in order to build a stable business plan, however this cloudy and archaic statute is too vague and doesn't account for gear group. There needs to be separation between gill net and seine, instead of placing them under the broad umbrella of the term "net fisheries".

This proposal should not be taken the wrong way, I, in no way am trying to allow a boat to travel from one area of Alaska to another, fishing two areas in the same calendar year, nor is it designed to allow a fisherman to seine one area and then go to a different vessel in a different area.

It is simply designed for a fisherman to be able to take part in a gill net fishery, and a salmon seine fishery in the same year and would clear up a lot of haze for cfec.

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Proposal 157: Support  
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Proposal 166:  
Proposal 167:

Proposal 168:  
Proposal 169:



**Submitted by:** David Kistler

**Community of Residence:** Fairbanks

**Comment:** It is still unclear to many of us using the O'Brien Creek Trail (4-wheelers) exactly what right of ways/private native lands/access to the fishing holes/existing fees are true laws. After 40 years of personal dip-net usage to the river it is a shame this is not set in stone. Thank you.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Connor Klebs

**Community of Residence:** Anchorage, Alaska

**Comment:** I go with my Uncle and his friend who owns a fishing business. These proposals will put him out of business! I also have trips planned to go fishing and won't be able to if these proposals come to fruition!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** John Klingel

**Community of Residence:** Fairbanks, AK

**Comment:** I am a 50 year resident and have been fishing and hunting all of those years, including many trips to Chitina and the Kenai to dipnet. Distributing fish between commercial users and personal users is a difficult task with no clear-cut answers, and as the world population, especially Alaska's, grows the bickering over said fishes will only get worse. In my opinion, neither party has any more claim to the fish than the other. Both parties contribute to the necessary mechanisms to ensure future returns, and both benefit financially from harvesting the fish. One party sells the fish to earn money and the other party enjoys harvesting them and/or saves money by doing so. I encourage "shared pain" when decisions about restricting the taking of fish need to be made.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. Thank you for the opportunity to express my opinion.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



February 15<sup>th</sup> 2023

Subject: Nushagak Stock of concern action plan. Institute at a minimum the following plan created by the BBSRI, advisory committees and the department. Please consider additional points to make the plan more effective.

- 1) Open drift and gill net fishing for the Nushagak District when the Nushagak sockeye escapement has reached one of the 6% of the total estimated run at the Nushagak sonar site.
- 2) Result of the above would be to open the Nushagak district sockeye fishery on June 25-26 instead of the traditional June 21-23. The King run passes at 5% per day and this would allow additional 20% of the run to pass.
- 3) In addition to the above, a hard opening of the Nushagak District sockeye fishery on June 28<sup>th</sup> would occur regardless of escapement goals. This is the traditional date when 60% of the king run has passed.
- 4) All the above would be independent of a Wood River Special Harvest. Fishing could open earlier in the Wood River Special Harvest Area to minimize commercial economic impact.
- 5) The above opening would be dependent on meeting the Wood River OEG.
- 6) Wood River Special Harvest Area net mesh size not to exceed 4.75 inches.
- 7) Closure of the Wood River Special Harvest Area would be dependent on either opening of the Nushagak District fishery and/or protecting the McClung king run (historically later than the Nushagak king run).
- 8) Manage the subsistence fishery inside of the existing regulations
- 9) Sport fishing annual bag limit reduced to 1 mature king over 28 inches, plus one king 20-28 inches, plus 5 king jacks. If the in river King escapement is projected to exceed 95,000 Sport Fish limits increased to 1 fish over 20 inches daily and 4 fish over 20 inches annually.

In summary, I believe the Nushagak king fishery is stressed due to sockeye nets being in its waters too early in the season and for too many hours of the day. Thus, the passage and survival of kings is currently being challenged to the point of extinction with current fishing practices. BOF has to change fishing practices to ensure their survival.

The above changes will help. Additional practices need to be implemented. It appears the managers are being required to manage escapement during the overabundance of Sockeye returning with tools designed for much smaller runs.

Additional tools that need to be implemented to ensure survival of the Kings.

District wide 4.75" mesh mandate allows more efficient catch rates and less net time in water.

15 percent of total sockeye run escapement past the sonar at portage creek to open the district, with a Hard opening of Drift and Set net sockeye fishery in the Nushagak district on June 28<sup>th</sup> Ensures King escapement and survival . The commercial fishery still remains economically viable.

Reduce the fishing hours in the district from 18 hours per day to 12 hours per day allowing passage of Kings throughout the run period to increase age and size diversity.

Thank you

**Submitted by:** Marshall Klontz

**Community of Residence:** Bonney Lake, Washington

**Comment:** I believe the Nushagak king fishery is stressed due to sockeye nets being in its waters too early in the season and for too many hours of the day. Thus, the passage and survival of kings is currently being challenged to the point of extinction with current fishing practices. BOF has to change fishing practices to ensure their survival.

The above changes will help but additional practices need to be implemented.

It appears the managers are being required to manage escapement during the overabundance of Sockeye returning with tools designed for much smaller runs.

Additional tools that need to be implemented to ensure survival of the Kings.

District wide 4.75" mesh mandate allows more efficient catch rates and less net time in water.

15 percent of total sockeye run escapement past the sonar at portage creek to open the district, with a Hard opening of Drift and Set net sockeye fishery in the Nushagak district on June 28th Ensures King escapement and survival. The commercial fishery still remains economically viable.

Reduce the fishing hours in the district from 18 hours per day to 12 hours per day allowing passage of Kings throughout the run period to increase age and size diversity.

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**Proposal 169:**



**Kodiak Aleutian Alaska Subsistence Regional  
Advisory Council**

c/o Office of Subsistence Management  
1011 East Tudor Road, MS 121  
Anchorage, Alaska 99503-6199  
Phone: 907-786-3888 Fax: 1-907-786-3898  
Toll Free: 1-800-478-1456



PC258  
1 of 3

In Reply Refer To:  
RAC/KA.23019.LHS

FEB 03 2023

Ms. Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

During the Kodiak/Aleutians Subsistence Regional Advisory Council's (Council) fall public meeting held on September 21-22, 2022, the Council developed the following positions and comments on Proposals 98, 103, and 169 that will be taken up by the Alaska Board of Fisheries (BOF) at upcoming BOF meetings.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Kodiak and Aleutian Region of Alaska. The Councils were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence use of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

**Alaska Peninsula/ Aleutian Island/ Chignik Finfish BOF Meeting comments**

**PROPOSAL 98**

***Modify waters closed to subsistence fishing for salmon to increase access for subsistence users who are not commercial salmon fishery permit holders. 5 AAC 01.425.***

The Council **supports Proposal 98**. The Council supports increasing access for subsistence users, who do not hold a commercial limited entry permit, to harvest salmon for subsistence when fish are readily available. Current restrictions, which prohibit commercial permit holders from harvesting salmon when commercial fishing is closed, will remain in place. Both Federal Subsistence Board and State Board of

Fisheries have established customary and traditional use determinations for subsistence salmon in the Alaska Peninsula Area. The current regulation limits opportunities and causes unnecessary burden on subsistence users in this area. Moreover, subsistence fishermen are restricted from subsistence fishing during commercial salmon openings, while sport fishermen are allowed to fish.

### **PROPOSAL 103**

***Reduce the bag and possession limit for coho and sockeye salmon in the salt waters and freshwater drainages of Cold Bay. 5 AAC 65.022.***

The Council **supports Proposal 103**. The Council supports this proposal and noted concerns from local subsistence users in Cold Bay, including the failure to achieve escapement of Sockeye Salmon in Mortensen's Lagoon since 2018 and an increase in sport fishing efforts on the north side of Cold Bay including Kinzarof Lagoon and outlet of Swan Creek. The Council supports this proposal to reduce the daily bag limit of Sockeye and Coho salmon combined to 5 per day that would provide for more conservative management for the saltwater and freshwater drainages of Cold Bay.

### **Statewide Finfish and Supplemental Issues BOF Meeting Comments**

### **PROPOSAL 169**

***Classification of banned invasive species. Amend the list of banned and invasive species into two categories to allow the legal possession and import of edible portions of listed species that may be sport caught in other states for consumption. 5 AAC 41.075.***

The Council **supports Proposal 169**. The Council supports this proposal because it will allow public removal of the Crustacean species of Signal Crayfish from the Buskin River area in Kodiak. Signal Crayfish are a banned invasive species that may not currently be "possessed" under existing regulations at any stage of its lifecycle. This regulation if adopted would allow for the harvest, possession, and consumption of Signal Crayfish, that are now present and prolific in the Buskin River and Buskin Lake on Kodiak Island. Sockeye Salmon return to the Buskin River annually and the system supports an important subsistence fishery. The Council has concerns that the Crayfish are consuming Sockeye Salmon eggs, alevin, and fry in Buskin Lake. This regulation would allow for harvest of Signal Crayfish from Buskin River and Buskin Lake, which will help reduce this invasive species and lessen negative impacts on Sockeye Salmon.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Lisa Hutchinson-Scarborough at (907) 310-4097 or [lisa\\_hutchinson@fws.gov](mailto:lisa_hutchinson@fws.gov).



Sincerely,

A handwritten signature in blue ink, appearing to read "Della Trumble".

Della Trumble  
Chair

Enclosure

cc: Federal Subsistence Board  
Kodiak Aleutian Subsistence Regional Advisory Council  
Office of Subsistence Management  
Interagency Staff Committee  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Administrative Record

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Proposal 169: Support

**Submitted by:** Rebecca Kravets

**Community of Residence:** Fairbanks, Am

**Comment:** I fish to provide food for my family, at the copper river, with my family and friends.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Drew Kress

**Community of Residence:** Wasilla, Alaska

**Comment:** I'm an avid fisherman in Alaska for both subsistence and sport. I use everything I catch from feeding my dogs and chickens, to my wife and kids as well. To my family fishing is a huge part of our life and what we do in our spare time together. We fish all over the state from the copper to Prince William Sound and the kenai.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Thomas Kretzschmar

**Community of Residence:** Anchorage

**Comment:** As a senior citizen and veteran I oppose the commercial efforts to limit or end our individual right to this state resource. We need to ensure salmon remain accessible and utilized by Alaskans personally to carry the tradition forward.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jaylein Kriska

**Community of Residence:** Fairbanks

**Comment:** Hello my name is Jaylein Kriska, I am 24 years old from Koyukuk, Alaska. My family and I fish to provide the nutrients we've had for millions of years through subsistence fishing. The economy of rural Alaska makes it very difficult to be able to fill your freezers for winter in order to provide for ourselves and families, meat and fish are expensive in the villages alone. I was in Seattle over the weekend and my heart broke seeing fresh Alaskan King Salmon on the market, and thought to myself "will my future children or grandchildren get to taste the rich king that we harvested ourselves without preservatives or toxins they may put in it." Before Alaska fish & Game came into Alaska our people were allowed to fish all summer long, this was back in the 1970s. We accepted the new guidelines we had back then to limit our fishing season to keep our salmon and waters alive. If you continue to let trawlers outside of Alaska fish, you're ruining our ecosystem. They catch thousands of fish weekly while we had 13 fish swim by a camera last summer. Please please please protect our waters and ways of life.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Stephen Kroll

**Community of Residence:** Homer

**Comment:** My immediate family and I utilize the personal use dip net fishery to provide food for us and our extended family. We live in various areas of the State and travel to the areas that are open to subsistence fishing. We all have various means of harvesting tools such as gear, boats, and ATV's etc... but, we have used commercial charter operators in the past to facilitate our goals. I believe it our right to access the resources by whatever legal means exist. Any restrictions that infringe on those means only limit access to the resource. All Alaskan residents own those resources and they should be managed in a way to provide subsistence over commercial harvest interests.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Ronald Kruckenberg

**Community of Residence:** Sterling/Anchorage Alaska

**Comment:** My name is Ronald Kruckenberg and I have lived in Alaska since 1973. I have fished in this state every chance I get. I own property and fish off the Kenai River and have seen and felt the effects of this Fish Board has had on our resources on the Kenai Peninsula. I have dipped the Copper River, Kasilof River and the Kenai River near all my life. My father whom has since passed away have gathered our food resources from these rivers and fed our families each and every year as we filled our freezers up. He fished from the shore of the Kenai River when he was 73 years old. It was becoming a struggle for him and then began to use a boat. We need all of our options to fish for food. We need all our resources because it's the way we live. First and foremost, it is in our State of Alaska constitution that the resources of our great state belong to all of the citizens of Alaska FIRST.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. If anyone should be named, it should be the commercial fishery and the greed for money they have developed.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

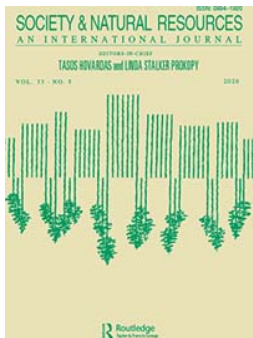
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**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



# Who's Winning the Public Process? How to Use Public Documents to Assess the Equity, Efficiency, and Effectiveness of Stakeholder Engagement

Meagan Boltwood Krupa, Molly McCarthy Cunfer & S. Jeanette Clark

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# Who's Winning the Public Process? How to Use Public Documents to Assess the Equity, Efficiency, and Effectiveness of Stakeholder Engagement

Meagan Boltwood Krupa , Molly McCarthy Cunfer, and S. Jeanette Clark 

National Center for Ecological Analysis and Synthesis, University of California, Santa Barbara, CA, USA

## ABSTRACT

It is widely recognized that stakeholder engagement processes produce advantages, but few studies acknowledge that they also can produce disadvantages. There is a global need to better assess stakeholder engagement processes by defining success and developing new methods to analyze stakeholder participation data. Our method of digitizing and coding stakeholder communications (1) produces a wide range of analyses, (2) tells the story of governance over time, (3) is comparable with other datasets, and (4) can be used wherever public documents exist. We demonstrate the utility of these integrated methods by examining statewide differences in public participation and success rates in Alaska's Board of Fisheries' (Board) proposal process. We determine that significantly different participation and success rates across the state indicate the existence of disadvantages and the need for further investigation into the equity, efficiency, and effectiveness of the Board process.

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natural resource  
management; public  
participation; stakeholder  
engagement; social  
ecological system


## Introduction

After the absence of major stakeholders in decision-making was recognized as a contributor to global fisheries collapse (Jentoft 1989; Cochrane 1999), agencies began to adapt their management processes to include stakeholders (Santiago et al. 2015; Dixon 2016; Pomeroy et al. 2016). Freeman (1984) defined a stakeholder as “any group or individual that can affect or is affected by the achievement of a corporation's purpose.”

Involving stakeholders in decision-making processes produces numerous advantages, ranging from achieving mutual understanding to improving regulation compliance (von Wirth et al. 2014; Butler et al. 2015; Ballou, Albritton, and Horowitz 2016). Stakeholder engagement is a strategic management perspective aimed at capturing knowledge, but it

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Color versions of one or more of the figures in the article can be found online at [www.tandfonline.com/usnr](http://www.tandfonline.com/usnr).

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can also create inclusive decision-making, promote equity, and build (Mathur, Price, and Austin 2008).

While this list of advantages appears impressive, none of these studies has examined the diversity of participants or whether there are structural, technical, or financial barriers to equitable, efficient, and effective participation. These advantages were generally identified through surveys administered by social scientists during or after stakeholder engagement processes. The advantages rarely appear as initial objectives. Reed (2008) advocated that “the process needs to have clear objectives from the outset and should not overlook the need for highly skilled facilitation.”

Over a decade later, very few of these processes have intentionally developed specific goals and objectives beyond meeting the criteria of establishing some type of stakeholder interaction. It is unlikely that all stakeholder engagement systems only produce advantages. Given this reality, there is little to no acknowledgement that some public processes could be causing more harm than good. While certain stakeholders and managers are clearly benefiting from the process, it is possible that not everyone shares in this success.

What if these systems are inherently biased against certain stakeholders? What if one group is allowed to “bully” a process because they possess the time and money it takes to effectively participate? What if the inefficient and combative structure of certain public testimony hearings exacerbates conflict between user groups? What if the public processes have decreased in utility over time because they haven’t modernized? Each of these questions challenges the assumption that the mere existence of stakeholder participation equals success.

Participation processes can strengthen current privileges and inhibit the expression of minority opinions (Nelson and Wright 1995). Empowering historically marginalized sectors to interact with power structures may produce negative interactions (Kothari 2001). Reed (2008) argued that the institutionalization of stakeholder participation was essential to overcome the limitations of a process dependent upon negotiated goals and uncertain outcomes. The danger is that this institutionalization may have produced internal processes that reflect institutional biases, such as environmental racism. Environmental racism was first defined as “the disproportionate impact of environmental hazards on people of color” (Bullard 1990). A recent study of this injustice demonstrated that people of color have a higher probability of living near pollution (Mikati et al. 2018). When people are not seen as powerful or do not have the education, time, and money to effectively attend meetings, they frequently are not seen as stakeholders. If you are not acknowledged as a stakeholder, you can not make things happen. Things happen to you.

Stakeholder engagement processes around the globe may benefit from a structured and quantitative examination of issues such as equity (i.e., diversity and inclusion), efficiency, and effectiveness. Semi-structured interviews produce many of the stakeholder participation studies (e.g., Pita, Pierce, and Theodossiou 2010; Carr and Heyman 2012; Young et al. 2013), but this approach may not reflect the true utility and diversity of governance participation. To obtain a holistic perspective of what is really happening in stakeholder engagement, we propose a more direct method that first establishes goals and objectives and then produces quantifiable results comparable with other biological, economic, and social datasets.

The pressing need to increase the accountability of stakeholder engagement systems can be addressed by (1) identifying general goals and localized objectives that define successful

stakeholder participation – ideally before the process takes place; and (2) comparative and qualitative analyses to determine if and how existing and future stakeholder engagement systems could be improved to better support these goals over time.

Since many stakeholder engagement processes have been in place for decades without clear goals and objectives, we suggest that retrospective stakeholder assessment goals should include the “3 E’s” of equity, efficiency, and effectiveness. Equity captures the ability of a diverse group of stakeholders to participate in the process. This involves adapting the process to acknowledge and overcome the constraints of socio-economic, cultural, racial, and gender differences that inhibit inclusion. Efficiency achieves the localized objectives of stakeholder engagement while maximizing the use of scarce resources. Effectiveness is the ability of a process to meet its goals and objectives in terms of both public and management needs.

Each stakeholder process can then be designed to meet localized objectives that support the guiding goals. Localized objectives could include anything from meeting specific agency mandates to addressing larger community concerns. Objectives will differ across public processes but all work toward achieving the goals. For example, if the goal is to ensure equity in a public process, then the localized objectives could include (1) subsidized travel costs, (2) childcare, and (3) interpretive language services. These specific and localized objectives promote equity by eliminating barriers to participants’ attendance.

With the establishment of “3 E” goals and localized objectives, the system can be audited to determine if the process is meeting the terms of success. One method of auditing the 3 E’s is to digitize and code the public documents that are produced through the stakeholder engagement process. Stakeholder communications, such as public proposals and comments, have the ability to directly inform natural resource management. These underutilized documents contain demographic information and provide insights into the successes and failures of both stakeholder processes and management measures. After these documents are quantified into a dataset, follow-up qualitative analyses can help explain the results and provide a pathway to supporting successes and resolving challenges.

We use an Alaskan case study to show how a digitization and coding method of archived public documents can be used to analyze one specific stakeholder process within the framework of the 3 E’s. Alaska was chosen because the Board of Fisheries (Board) was one of the first stakeholder engagement processes and has a relatively long history of public records.

The Board is lauded as a key component to Alaska’s fisheries management successes, but nobody has defined the measures of success or investigated how the process is functioning. Research into the guiding Board documents produced very little insight into the definition of a successful public process – other than a public process was put into place in 1959 and continues to exist. Most of the statutory and public information focuses on the role and composition of the Board (Alaska Department of Fish and Game (ADFG) 2019a). Since the Board process does not have clear goals and objectives, the 3 E’s is used to frame the discussion of how the public process is performing. Although the Board process has not significantly changed since 1959, Alaska has changed. The increasing urbanization of Alaska parallels the Columbia Basin, bringing the challenges of population, pollution, and pavement to the Last Frontier.



Every three years, the Board requests regional fisheries management. According to the Alaska Department of Fish and Game's (ADFG) website, the Board process is "among the most open regulatory processes in Alaska if not the nation" (Alaska Department of Fish and Game (ADFG) 2019b). "Anyone can submit a proposal and provide written or oral testimony on any of the proposals, which constitute potential regulatory changes and are accessible in an online proposal book" (Alaska Department of Fish and Game (ADFG) 2019b). Board staff log the proposals and store them online in meeting documents or in boxes at Juneau's State, Library, Archives, and Museum (SLAM). The proposals provide detailed information about stakeholder demography, organizational memberships, and positions.

We assess stakeholder engagement by using a case study to test the 3 E's framework through an integrated digitization and coding method. By transforming stakeholder communications into a dataset that produces a wide range of analyses, it is possible to more accurately study governance over time. The method can be used wherever public documents exist, and the resulting dataset is comparable with other biological, economic, or social datasets.

The Board proposal dataset provides only one example of this method's utility. The dataset has the capacity to support the Board and fishery managers but also stakeholders and scientists. We begin with an overview of the complexity of Alaska's fisheries governance system.

## Alaskan Fisheries Governance

The Magnuson-Stevens Fishery Conservation and Management Act established the North Pacific Fishery Management Council (NPFMC) in 1976. The NPFMC manages Alaska's fisheries from 3 to 200 miles offshore (NPFMC 2019). The Board and ADFG govern inland fisheries to three miles offshore. The U.S. Fish and Wildlife Service (USFWS) manages freshwater and subsistence fisheries on federal lands. ADFG fishery managers are tasked with conservation management. The Board mostly makes the allocation management decisions but is also tasked with determining conservation measures and facilitating public communication. This division is generally seen as beneficial, extracting the allocation issue from conservation management and state politics. The Governor appoints the seven Board members, who are then confirmed by the legislature. Board members should represent the diversity of fishing sectors and geographies. Members are appointed based on their "interest in public affairs, good judgment, knowledge, and ability in the field of action of the Board, and with a view to providing diversity of interest and points of view in the membership" (Alaska Department of Fish and Game (ADFG) 2019b).

Local fish and game Advisory Committees (ACs) were created at the outset of the Board process to facilitate regional participation. Although the ACs have no regulatory authority, they provide localized knowledge. Currently, there are 84 ACs made up of 9–15 members. The ACs meet one to six times a year. The State supports these meetings with regional biologists and travel support. (Alaska Department of Fish and Game (ADFG) 2019b).

The Board reviews proposals every three years or “out of cycle” to address problems (Alaska Department of Fish and Game (ADFG) 2019b). The cycle starts with an announcement requesting public proposals using a standardized form (Supplementary Appendix A). Each submission describes the suggested action and potential impacts to other users (Supplementary Appendix A). Board staff compiles the proposals and then presents them to the public for review and comment before the Board decides on implementation. The cycle concludes with regulatory meetings which include public testimony and usually are held between October and March (Alaska Department of Fish and Game (ADFG) 2019b).

According to the ADFG website, “the Board uses biological and socioeconomic information from ADFG, public comments, and guidance from the Alaska Department of Public Safety and Alaska Department of Law” in its regulatory decisions (Alaska Department of Fish and Game (ADFG) 2019b). The Board’s daunting task is to manage diverse fisheries across a geographically and culturally complex state.

In support of improving the Board process, the primary goals of this study are to (1) provide the Board and the public with useful information to help navigate the complex waters of Alaskan fisheries governance and (2) develop a universal method for assessing stakeholder engagement systems with the objective of improving their equity, efficiency, and effectiveness.

## Methods

This paper utilizes the methods from a three-region, 15-year pilot study that was completed in 2018 (Krupa et al. 2018a). Our study used the Board proposals, which are found online as PDFs at the ADFG Board website from 2003 to present and in paper format at State Library, Archives, and Museum (SLAM) in Juneau, Alaska, from 1960 to 2003 (Alaska Department of Fish and Game (ADFG) 2019c). The paper SLAM records were digitized into PDFs.

We individually logged and coded 24,731 Board proposals submitted between 1960 and 2016 using a spreadsheet-based program (Krupa, Cunfer, and Clark 2017). We modeled the coding system on a PowerPoint presentation given by former Board Chair John Jensen (Jensen 2014). The expanded dataset in this study records 19 variables, a selection of which are described in Table 1. A coding manual describes how to code each of these variables (Krupa, Cunfer, and Clark 2018b). For example, the manual contains specific definitions for the proposal authors’ groups. The coding process was governed by frequent quality assessment, with random and repeat sampling to check for accuracy, correct errors, and adapt the coding process as needed.

The results were published in two open access venues: (1) the Knowledge Network for Biocomplexity (KNB) on DataOne (Krupa, Cunfer, and Clark 2017) and (2) an R Shiny App (Krupa et al. 2018c). The KNB dataset, which requires technical knowledge to utilize, was intended for research scientists. The R Shiny App was intended for non-scientists. While the KNB dataset provides the capacity for more detailed analysis, the R Shiny App allows non-scientists to conduct generalized assessments with otherwise inaccessible data. We hope that this combination of analytic tools will improve the transparency and utility of our method but recognize that there is more work to be

**Table 1.** Coded variables and allowed values<sup>a</sup>.

Variable	Definition and allowed values
Date	Any date, formatted as YYYY-MM-DD
Area	Primary area(s) that the regulation change pertains to. Allowed values: Statewide, Alaska Peninsula and Aleutian Islands, Arctic, Bristol Bay, Chignik, Cook Inlet, Copper River, Kodiak, Kotzebue, Kuskokwim, Norton Sound, Prince William Sound, Southeast, Yukon
Meeting	Meeting name as listed in documents
Species	Primary species that the regulation change pertains to. Allowed values: Groundfish, Herring, Salmonids, Shellfish, Other
Sector	Primary sector that the regulation change pertains to. Allowed values: Commercial, Personal Use, Sport Fish, Subsistence
Proposal number	Proposal number as listed in meeting documents
Regulation number	Regulation(s) proposed to be changed
Action	Board action on proposal. Allowed values: C (Carried), C/A (Carried w/ Amendment), N/A (No Action), T (Tabled), U (Unlisted), F/A (Failed w/ Amendment), F (Failed)
Proposed by	Name(s) of proponents for proposal
Group	Classification of proponent(s). Allowed values: Individual, AC (Advisory Committee), ADFG (Alaska Department of Fish and Game), Association, Board of Fisheries, Business, Government, Hatchery, Tribe/Village Council
Members in favor	Number of board members voting in favor
Members against	Number of board members voting against

<sup>a</sup>For a full list of coded variables and definitions, refer to Krupa, Cunfer, and Clark (2017).

done in building accessible data tools. We used the KNB dataset to examine stakeholder participation and success rates.

Our analysis focused on (1) stakeholder participation (proposals) in each region, group, sector; (2) stakeholder success (actions) for each region, group, and sector; and (3) stakeholder participation (proposals) over time by group and gender. We used R statistical software, supported by MASS, nnet, effects, tidyverse, and ggplot2 to complete the analyses. We removed incomplete records and chose baseline values. We chose all statewide proposals as the Region baseline; Individuals as the Group baseline; Commercial as the Sector baseline; and No Action (N/A) for the Action baseline. In many cases, there are multiple groups, regions, and sectors associated with each proposal in the dataset. In this analysis, only the first region, group, sector listed was considered for each proposal.

A Chi-squared test for independence was run to determine association between the proposal action and the targeted proposal region, or if there was a regional difference. A second Chi-squared test determined the association between proposal action and group, or if the action varied according to group. A third chi-squared test determined the association between the proposal action and sector, or if the proposal action varied according to sector.

A proportional odds model determined the likelihood of action related to group. A multinomial logistic regression model predicted a superior fit following a Chi-square goodness of fit test. We then used the model to determine success derived from (1) region, group, and sector; (2) the likelihood of a proposal carrying or having no action according to its region, group, sector; and (3) marginal effects.

To examine the influence of ADFG proposals on regional success, we removed ADFG from the above analyses to determine whether its absence would significantly alter the results by region. Finally, we used a time-series plot of the data to examine

participation over time. Because the Board process is on a 3-year cycle, we fit the annual data with a generalized linear model based on a Poisson distribution. Two time-scale analyses included all groups and the three least successful groups (Tribe/Village Councils, Individuals, Associations).

To estimate gender participation over time, we filtered all proposal submitters for the group "Individual," and considered them unique participants. We then extracted their first names and removed punctuation and common honorifics. To assign a gender, first names were compared to United States Social Security Administration baby name data using the R package Gender (Mullen 2018). We used this method to match each name to a proportion of males and proportion of females given that name between 1900 and 2000. Ambiguous names where the proportion of one gender was between 25% and 75% were removed from the dataset. Using this method, 94% of first names were matched to a non-ambiguously gendered name.

We used decennial Census data with 2017 American Community Survey data for total female population data (Manson et al. 2018). Commercial fishing data was taken from the Commercial Fisheries Entry Commission (CFEC) (ADFG 2016). The same method used to match Board participants to a gender was used for Alaska resident commercial fishing permit holders. Using this method, we matched 96% of first names to a non-ambiguously gendered name. An Alaska resident sport fishing license dataset, which includes gender, provided the sport fishing data (ADFG 2016a). The permit data does not include all fishing residents. Alaskan residents need to purchase a license between the ages of 18 and 59. Individuals under the age of 18 do not need to obtain a license and can fish for free. Individuals over the age of 60 are eligible for a free Permanent Identification (PID) card. These unlicensed age groups are not included in the analysis.

## Results

### Region

We used a chi-squared test to explore whether the proposal action was unaffected by the proposal region or if independence exists between the two variables of action and region (Table 2). A  $p < 0.05$  strongly suggests the action varies according to area.

The probability of a statewide proposal carrying ( $p_c$ ) is 0.31. Five regions surpass this statewide rate: the Arctic, Kotzebue, Norton Sound, Kodiak, and Chignik. Yukon, Prince William Sound, and Kuskokwim have a probability of approximately 0.30. The regions with the lowest probability of a proposal passing are Bristol Bay ( $p_c = 0.21$ ) and Cook Inlet ( $p_c = 0.19$ ) (Figure 1).

Arctic and Kotzebue proposals are the most likely to succeed with nearly a 0.5 probability of a proposal carrying, but these regions also have a high proportion of ADFG submissions. The Arctic's success rate is very high due to a high number of ADFG proposals. Cook Inlet proposals are the least likely to be carried, with  $< 0.20$  probability of a proposal carrying. Cook Inlet also has the highest probability of no action (Figure 1), which is indicative of the large volume of repeat proposals generated by that region.

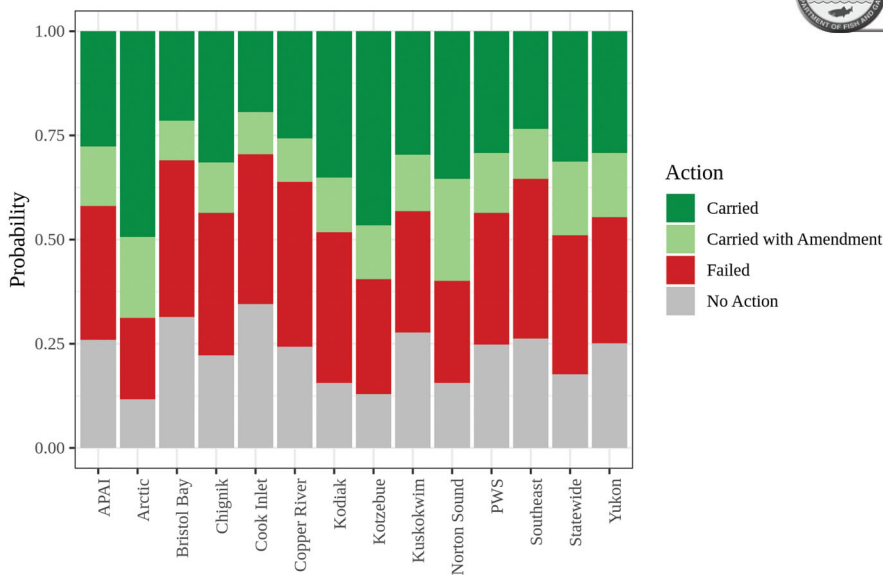


Table 2. Action by region contingency table.

	Statewide	APAI <sup>a</sup>	Arctic	Bristol Bay	Chignik	Cook Inlet	Copper River	Kodiak	Kotzebue	Kuskokwim	Norton Sound	PWS <sup>b</sup>	Southeast	Yukon
N/A	221	490	9	626	81	1522	118	208	15	111	47	284	1381	229
C	391	522	38	428	115	856	125	467	54	119	107	334	1231	267
C/A	221	270	15	191	44	444	51	175	15	54	74	164	630	140
F	418	606	15	751	125	1585	193	480	32	117	74	361	2016	277

<sup>a</sup>APAI: Alaska Peninsula and Aleutian Islands; <sup>b</sup>PWS: Prince William Sound. Call: xtabs (formula = ~Action + Region, data = data). Number of cases in table: 19,934. Number of factors: 2. Test for independence of all factors: Chisq = 650.5, df = 39, p-value << 0.05.





**Figure 1.** Regional probability of Board of Fisheries proposals by action.

**Table 3.** Action by group contingency table.

	AC	ADFG	Association	Board of Fisheries	Business	Government	Hatchery	Individual	Tribe/ Village Council
C	339	3,624	251	72	93	78	28	554	15
C/A	307	990	331	44	55	51	30	649	31
F	1,102	307	1271	30	480	85	7	3657	111
N/A	687	471	992	25	186	71	30	2790	90

Call: xtabs (formula = ~Action + Group, data = data). Number of cases in table: 19,934. Number of factors: 2. Test for independence of all factors: Chisq = 8,601, df = 24, *p*-value < 0.05.

Removing ADFG from the analysis does not change any of the results in the Group section since the groups are independent. However, the regional results do change with ADFG’s removal. Kotzebue and Norton Sound are still slightly more likely to have successful proposals, but the remaining regions are tightly clustered. The Arctic is not interpretable because of the high number of ADFG proposals. Cook Inlet still has the highest probability of No Action.

**Group**

To determine association between the proposal action and the group, we conducted a Chi-squared test. A *p* < 0.05 determined that the proposal action varies from the submission group (Table 3).

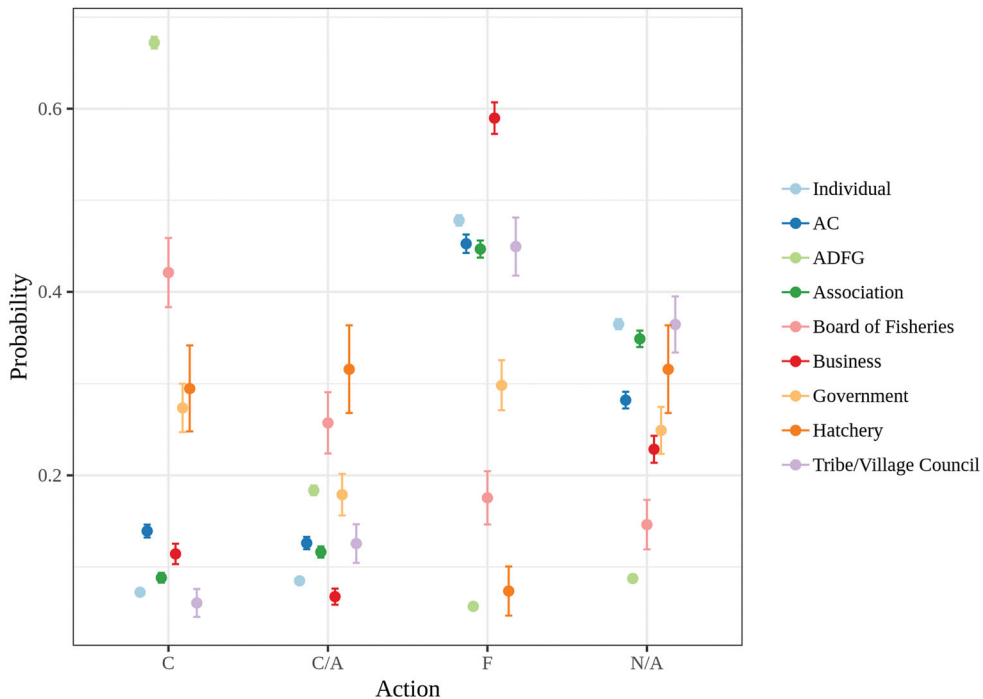
ADFG submitted the second highest number of proposals, distantly followed by Associations, ACs, Businesses, Government, Board, Tribes/Village Councils, and Hatcheries (Table 3). The other groups submitted much fewer proposals.

According to the multinomial model (Table 4), the log odds of carrying as opposed to no action differed across groups. In other words, the odds of a proposal carrying increase by 0.91 if it is submitted by an AC as opposed to an individual (Table 4). The



**Table 4.** Multinomial model results for action by group.

	(Intercept)	AC	ADFG	Association	Board of Fisheries	Business	Government	Hatchery
C	$-1.62 \pm 0.05$ $p \ll 0.05$ $z = -34.76$	$0.91 \pm 0.08$ $p \ll 0.05$ $z = 11.23$	$3.67 \pm 0.07$ $p \ll 0.05$ $z = 54.142$	$0.24 \pm 0.09$ $p = 0.004$ $z = 2.87$	$2.67 \pm 0.24$ $p \ll 0.05$ $z = 11.30$	$0.92 \pm 0.14$ $p \ll 0.05$ $z = 6.83$	$1.71 \pm 0.17$ $p \ll 0.05$ $z = 10.03$	$1.55 \pm 0.27$ $p \ll 0.05$ $z = 5.80$
C/A	$-1.46 \pm 0.04$ $p \ll 0.05$ $z = -33.46$	$0.65 \pm 0.08$ $p \ll 0.05$ $z = 8.029$	$2.20 \pm 0.07$ $p \ll 0.05$ $z = 31.03$	$0.36 \pm 0.08$ $p \ll 0.05$ $z = 4.69$	$2.02 \pm 0.25$ $p \ll 0.05$ $z = 7.96$	$0.24 \pm 0.16$ $p = 0.13$ $z = 1.50$	$1.13 \pm 0.19$ $p \ll 0.05$ $z = 5.98$	$1.46 \pm 0.26$ $p \ll 0.05$ $z = 5.57$
F	$0.27 \pm 0.03$ $p \ll 0.05$ $z = 10.76$	$0.20 \pm 0.06$ $p \ll 0.05$ $z = 3.69$	$-0.70 \pm 0.08$ $p \ll 0.05$ $z = -9.01$	$-0.02 \pm 0.05$ $p = 0.64$ $z = -0.46$	$-0.09 \pm 0.27$ $p = 0.74$ $z = -0.32$	$0.68 \pm 0.09$ $p \ll 0.05$ $z = 7.53$	$-0.09 \pm 0.16$ $p = 0.57$ $z = -0.56$	$-1.73 \pm 0.42$ $p \ll 0.05$ $z = -4.10$

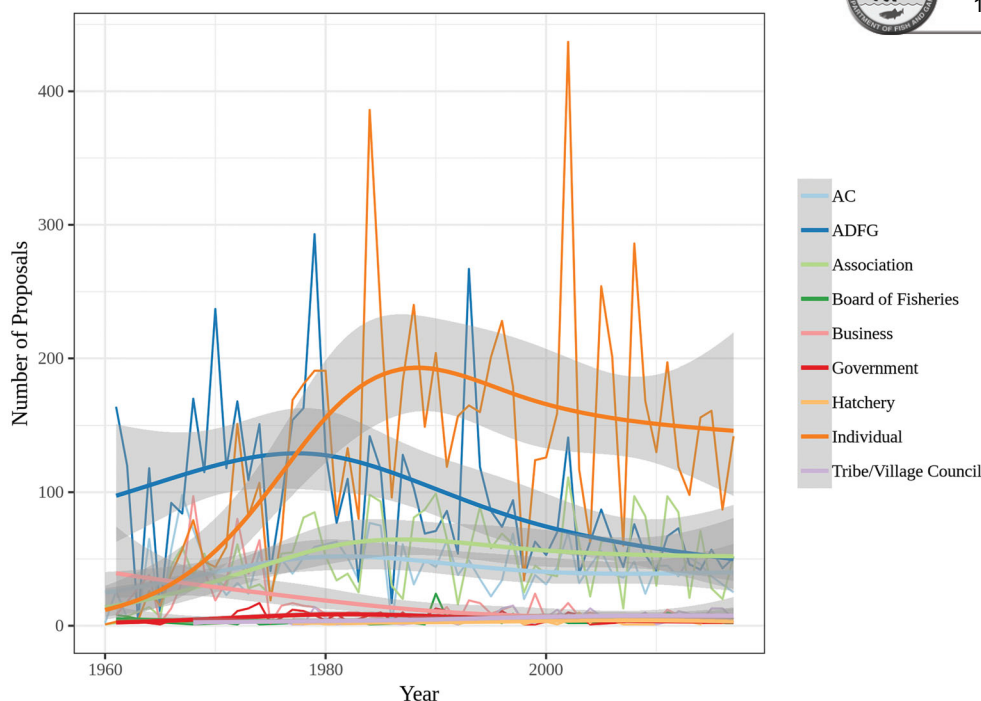
**Figure 2.** Probability of Board of Fisheries proposal action by group.**Table 5.** Action by sector contingency table.

	Commercial	Personal use	Sport fish	Subsistence
C	3,504	69	1,011	465
C/A	1,722	62	456	245
F	5,199	164	1,327	357
N/A	3,563	182	1,148	442

Call: xtabs (formula = ~Action + Sector, data = data). Number of cases in table: 19,916. Number of factors: 2. Test for independence of all factors: Chisq = 179.07, df = 9,  $p$ -value  $\ll 0.05$ .

log odds of an ADFG proposal carrying will increase by 3.66, producing the great-est odds.

The marginal effects of the multinomial model produced intriguing results. An AC has an average proposal carrying probability of 0.32. All other groups average 0.25. Therefore, AC proposals have an 8% greater chance of carrying than the other groups. Conversely, an AC proposal is 3% less likely to fail, and 7% less likely to receive no



**Figure 3.** Number of Board of Fisheries proposals by group over time.

action than other groups. These probabilities clearly show that a proposal submitted through an AC is more likely to succeed (Figure 2).

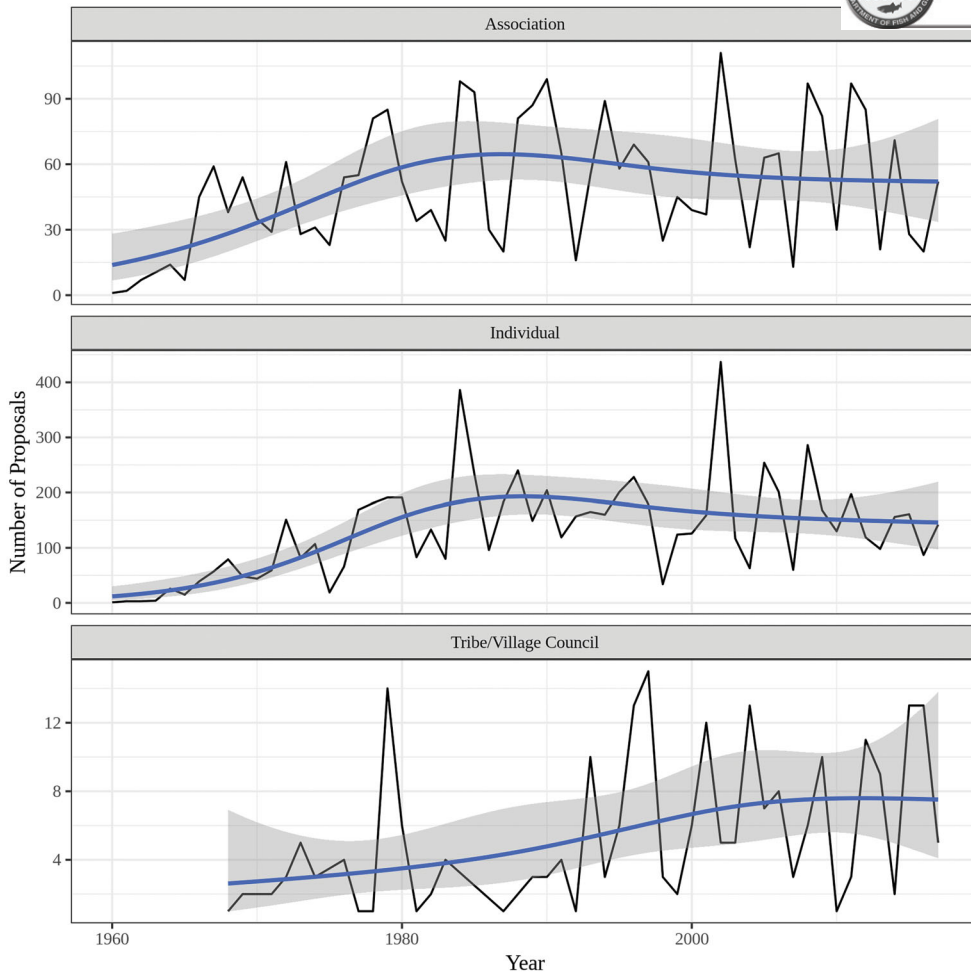
ADFG is still by far the most successful group with  $>0.60$  probability of a proposal carrying. Individual, Association, Business, AC, Tribe/Village Council are the least successful groups with  $>0.40$  probability of a proposal failing (Figure 2).

### Sector

We performed a Chi-squared test to determine association between the proposal action and the target sector. A  $p < 0.05$  demonstrated that proposal action varies according to sector (Table 5). The proposal sector with the highest probability of being carried is the Subsistence sector, with a probability of 0.31. Sport Fish and Commercial proposals both have a probability of 0.25 of being carried, while Personal Use proposals have a probability of 0.14.

### Participation over time by group

Over the course of the Board existence, three groups have been significantly less successful than the others: Individuals, Associations, and Tribes/Villages Councils. To examine whether this overall lack of success is accompanied by a change in participation, we examined the total number of proposals submitted by these three groups through time. Individual participation increasingly rose during the first two decades of the process, peaked in the late 1980s and early 1990s, and then steadily declined to the present day (Figures 3 and 4). Association participation has remained relatively stable



**Figure 4.** Number of Board of Fisheries proposals submitted by associations, individuals, and tribes/village councils over time.

over time (Figure 4). The participation of Tribes/Village Councils slightly increased, but participation rates are still extremely low for this group across the entire time period (Figure 4).

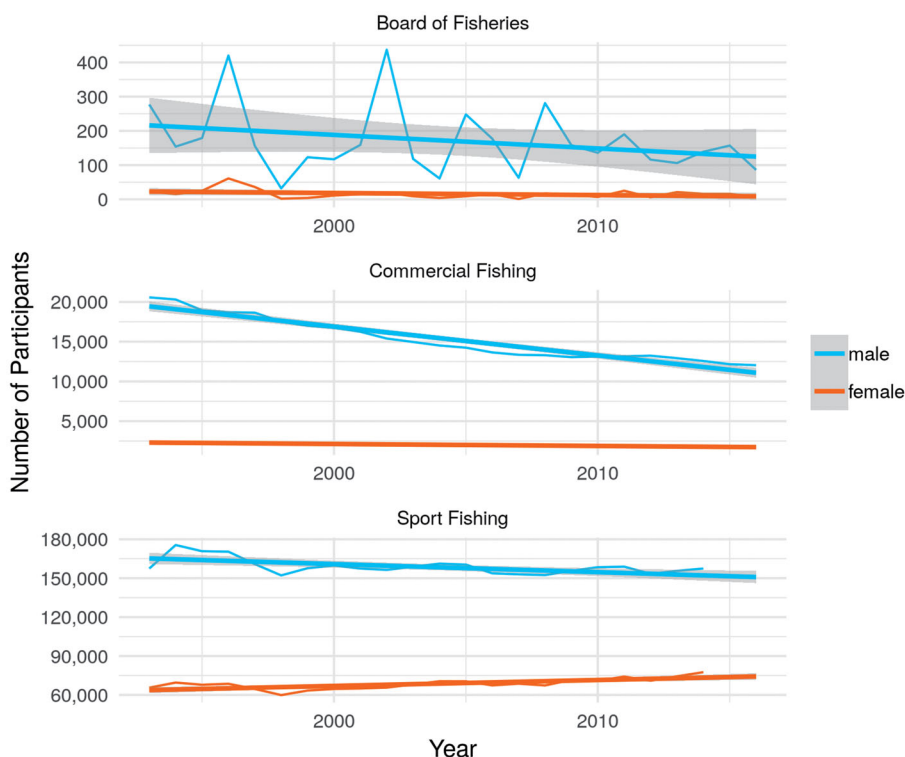
### **Participation over time by gender**

To test whether gender and fishing sector participation are independent, we performed a Chi-squared test on a sample ( $n=500$ ) of the data across all years (Table 6). The  $p\text{-value} < 0.05$  indicates that gender and sector are not independent. We repeated this test for a sample ( $n$  = smallest number of observations among sectors in each year) and confirmed that for every individual year, the gender and sector are also not independent.

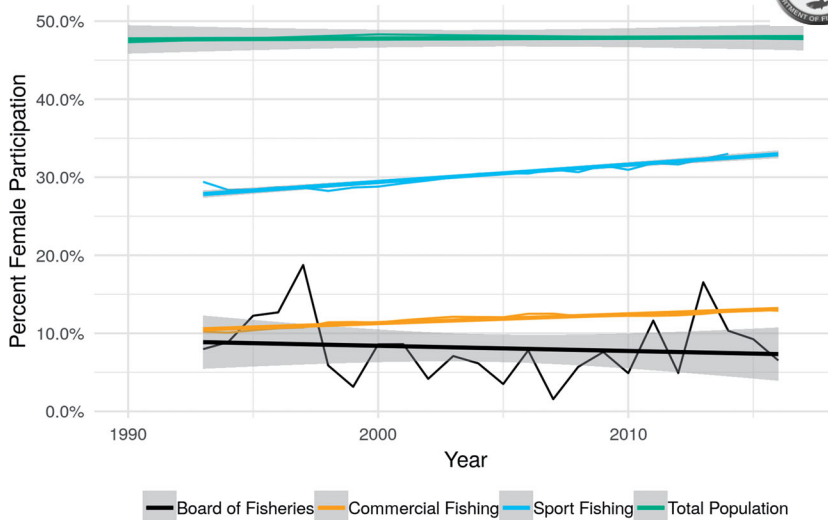
We then calculated the slope of the change in sector participation (Figure 5). Female participation is significantly increasing for both commercial fishing and sport fishing

**Table 6.** Slope and confidence intervals of the percent of female participants over time.

	Slope	2.5 %	97.5 %
Board of Fisheries	-0.0007	-0.0032	0.0019
Commercial Fishing	0.0011	0.0009	0.0013
Sport Fishing	0.0022	0.0018	0.0026

**Figure 5.** The slope of participation in the Board of Fisheries proposal process, commercial fishing, and sport fishing over time.

(positive slope within 95% confidence interval). Female Board participation, however, is not significantly increasing (slope of 0 is within 95% confidence interval). We found that the increase in the percentage of female participation in commercial fishing among Alaska residents is driven not by an increase in female commercial permit holders, but rather a sharp decrease in male commercial permit holders. The increase in female participation in sport fishing, however, is driven by both an increase in the number of female sport fish license purchasers and a decrease in the number of male sport fish license purchasers. To further examine changes in women's participation, we calculated the percentage of female participants, excluding individuals with unknown gender, in each fishing sector over years with available data against the total female population (Figure 6). For the time period we analyzed, the change in the percentage of Alaska's female population is not significantly increasing or decreasing.



**Figure 6.** Percentage of female participation in the Board of Fisheries, commercial fishing, sport fishing, and total female population in Alaska over time.

## Discussion

Alaska's Board proposal process is dominated by state agencies and produces very low public participation and success rates. Our results indicate that significant disadvantages exist within the Board process. We will examine these disadvantages within the 3 E's framework and discuss potential causation for these results while acknowledging that more qualitative analysis is needed.

Over time, the public has played a large but relatively unsuccessful role in the Board's proposal process. The dataset clearly describes the process as more administrative than public. ADFG and the Board – the two state agencies that create and run the process – dominate in terms of proposal success rates. If the Government, Board of Fisheries, and ADFG groups are combined into a single “government” group, that group submitted 30% of the proposals over the entire Board process. Within this minority of proposals, however, is the majority of successful proposals. Government entities submitted 75% of all carried proposals. From an administrative perspective, this appears to be a highly efficient and effective process.

When you look at public participation, the process looks entirely different. Our results indicate the existence of serious barriers to diverse and inclusive public participation. If you combine Advisory Committees, Hatcheries, Businesses, Associations, Tribes/Village Councils, and Individuals into a single “public” group, that group submitted 70% of the proposals to the Board. Of successful (carried) proposals, however, only 25% originate from this public group. ACs have the highest success rates within public groups, but they still fall far behind government agencies. Although Individuals are submitting the largest number of proposals, they have the lowest success rates across the state. Associations and Tribes/Village Councils have both low participation and success rates. These numbers indicate issues with equity, efficiency, and effectiveness across the public participation component of this system.

Before we use the 3 E's to present a few key observations about this process, we need to explain a few caveats to the above numbers. It is possible that a fraction of these public proposals is successful but not appearing so because they were combined into one successful ADFG proposal. When numerous similar proposals are submitted, ADFG will often combine them into a new proposal authored by ADFG. This combined ADFG proposal appears within the ADFG group in our data, hiding the successes of the other groups that contributed. It is also possible that Tribes/Village Councils are submitting proposals through other groups, such as Advisory Committees, and that participation does not appear in our dataset. Additionally, ADFG does not submit allocative proposals as a general rule. Regions and groups, such as the Arctic and ACs, that focus on fisheries management might be more successful because, unlike most of the other regions, their proposals are related to solving management problems. Finally, proposal submission is just one indicator of participation in the Board proposal process. Many individuals and groups participate in other ways, such as providing oral and written testimony and/or supporting or opposing proposals. Due to time and funding constraints, this research does not examine these alternate forms of participation; but we do believe that further analysis would be beneficial.

### **Equity**

Even though Tribes/Villages Councils may be participating in other ways, their extremely low participation rates indicate that the overall diversity of participants may be low. Due to the proposal form's lack of demographic data on race, nationality, and age, we were unable to collect more detailed information on the composition of individuals beyond their group affiliation. Without additional qualitative analysis, we can only speculate on the reasons for this low diversity; but language barriers, cultural differences, and unfamiliarity with the system could all pose challenges to public participation across Alaska.

For example, if an individual or group wants to testify before the Board, they must first turn in a blue "Public Testimony Sign Up Card" to the Board staff (Alaska Department of Fish and Game (ADFG) 2019d). If they are providing written material, they must also submit 25 copies of the material to Board staff with their blue testimony card. At the beginning of each meeting, the Board Chairman announces the length of time for testimony. Generally, each group is allowed 3–5 minutes for public testimony on Board proposals. Advisory Committees, however, are allowed 10–15 minutes. Given the relatively high AC success rates within public participation, there may be a correlation between time limits and success. The time limits certainly aid in efficiency; but effectively speaking your mind within 3–5 minutes or even 15 minutes requires practice and training. Additionally, many cultures find time restrictions on their testimony to be offensive. Certain cultural norms dictate an introduction that explains a person's identity and place before they even comment on a proposal. This introduction can consume much of the 3 minutes, giving individuals little time to explain their perspectives. Adjusting the process to account for these cultural dimensions may strengthen public participation.

Gender distribution is another indicator of low diversity within the Board proposal process. Our study of the relationship between the Board proposal dataset and Alaskan commercial and sport fishing permit ownership indicated very low rates of female



participation over time despite their rising participation in sport fishing ; commercial permit ownership (Figures 5, 6). Without qualitative analysis, it is difficult to prescribe a cause to the gender gap; but the design, accessibility, and clarity of the public process could all be contributors. A recent study of sport fish anglers commissioned by ADFG concluded that women are afraid of sounding uneducated in their fisheries knowledge and do not want to be stereotyped (Escher 2018). This fear may be limiting some female participation in the Board process, which is dominated by individuals and groups who have participated for decades. It is also possible that women do not see a role for themselves in a process dominated by male Board members. Only 4% of the Board members have been women since its inception (Clark 2017). Another limiting factor could be that fisheries professionals are commonly paid to participate. According to a recent study of U.S. fisheries professionals, these leaders are predominantly men (Arismendi and Penaluna 2016). Since most meetings last between 7 and 10 days, it is very difficult to voluntarily engage with the process if you have a job and/or a family. Considering how to make the process more accessible to groups including single parents, caregivers, and the disabled may prove beneficial to increasing overall participant diversity.

Meeting locations and Alaska's geography also combine to make a formidable barrier to inclusion. The Board process is geographically isolated from much of the state. Nearly all Board meetings take place in Cook Inlet, which also has the state's highest population and biggest city of Anchorage (Krupa et al. 2018d). Cook Inlet has many distinct rivers with high-value fisheries, numerous interest groups, and is located on the road system. The Cook Inlet stakeholders, therefore, have both the incentive and ability to participate in the Board process. This could explain the high percentage of individual submitters and overall high numbers of Cook Inlet proposals. Upper Cook Inlet is so complicated that the Board process (and stakeholders) may benefit from dividing the region into 2–3 separate meetings.

In contrast, Kotzebue has far fewer high-value fisheries, a much lower population, and is located off the road system. If you live off the road system, you rely upon a complex network of expensive transportation often dependent on the weather. Transport could include a combination of ATVs, snowmachines, chartered planes, boats, and commercial flights. The cost of sending one person who lives off the road system to a 10-day Board meeting is about \$3,000. This estimate does not include the costs of the research and preparation work that is done before the meeting. If an individual or group cannot afford these high participation costs, their chance of success plummets. It is well known that showing up at Board meetings greatly increases your odds of submitting a successful proposal (Glenn Haight, personal communication, March 29, 2019). Even if a non-Cook Inlet group can afford to attend meetings, bad weather could also prevent their meeting attendance. Since most of the state is not Cook Inlet, these factors could potentially exclude a wide geography of people. Even though it may cost the state more money with increased logistics, holding meetings across the state would likely improve regional participation and success rates.

## **Efficiency**

In Alaska's Board process, efficiency is a key concern due to the enormous volume of proposals on the same issue submitted across all of the groups. These proposals could



be identical or diametrically opposed. When a suite of proposals addressing an issue are presented to the Board, the Board takes up the first proposal and groups the remaining proposals into No Action. That single representative proposal is either passed with significant amendments or failed. There are currently no limits on proposal submission.

No Action generally implies that (1) the Board does not have the authority to deal with a proposal, or (2) that the proposal already exists in the agenda (i.e., repeat proposal). According to the Board's Executive Director Glenn Haight, at least 50% of No Action proposals fall into the second category (Glenn Haight, personal communication, March 29, 2019), indicating that the open submission process is vulnerable to inefficiencies created by similar proposals (Table 2). Each proposal on a similar issue increases the workload of Board staff and members and provides little to no benefit in the overall regulatory process. It's possible that similar proposals, which largely originate from Cook Inlet stakeholders, are making it difficult for the Board and the staff to work on other regions. Stakeholders from other regions could then suffer from inequity because Cook Inlet issues could dominate their regional meetings with out of cycle proposals. The dataset shows that an "open process" might not be a clear indicator of success, at least related to equity, efficiency, and even effectiveness. Limiting the number of similar (and failed) proposals, especially over time, appears to be desperately needed.

### **Effectiveness**

Similar issue proposals not only occur within each cycle, they occur (and often fail) across decades. The amount of time and resources that these proposals have consumed would shock outsiders but come as no surprise to veterans of the process. If a stakeholder process is bogged down with similar issue proposals, most of which consistently fail over time, then that process is not as effective as it could be. It is possible that in order to be equitable, efficient, and effective, open processes need limits to actually remain open in terms of the 3 Es. One idea would be for the Board to only accept repeat proposals if the submitter can document that new circumstances warrant additional review.

The number of similar issue and repeat proposals could also indicate a much bigger problem. Stakeholders may just be waiting for the right political atmosphere (e.g., the Board composition) to get their proposal passed. As the Board members switch out with each new governor or term limit, groups submit the same proposal, hoping for a winning atmosphere. The dataset could be used to show whether Board votes on specific issues have varied over time. Further coding of the proposals could even reveal whether ADFG has switched its position on issues by tracking the agency's position on specific proposals. While many participants recognize the Board process as "political" science, ADFG and the Board have asserted that their decisions are grounded in biological and social science. Further analysis of the dataset in combination with qualitative surveys of Board members and participants could shed light on the actual use of biological and social science in Board decision-making.

Participation rates are another factor that could reduce effectiveness. Our study of participation rates over time show an overall decline of proposal submissions (Figure 5





and 6). We speculate that two main factors could produce this over retirement/deaths; and (2) frustration with the process. While we have not conducted a quantitative analysis of individual name frequency, qualitative assessment (particularly of the Cook Inlet region) indicates that the majority of individual proposals originated from a relatively small group of people who have actively participated since the process began. As members of this group die, the overall number of proposals has decreased. If new participants are not joining, the process risks becoming irrelevant.

It is also possible that groups are growing frustrated with either the actual process or their failures and have simply stopped participating. Successful participation in the Board process requires dedication and commitment. Submitting a strong proposal requires doing adequate research and gaining support through meeting attendance and public testimony. After having proposals continuously fail over decades, it is entirely possible that certain individuals or groups have called it quits. The decline of business proposals, such as those submitted by seafood processors in Southeast Alaska, may demonstrate abandonment of the process. Businesses may have decided the process was not worth their time and redirected their effort into lobbying or other more effective means.

The Board may have also solved the problem concerning stakeholders. After decades of stakeholder participation, the Board process has created very complicated allocation plans. It is possible that groups are just trying to work around the edges of these plans in an attempt to increase their allocation. Whatever the reason, Board participation is clearly decreasing, and the current process appears unsustainable. Trainings could help to recruit new participants; but a modernization and adaptation of the process might be needed to expand participation.

An adapted process might also help to address one of the more concerning issues impacting Board effectiveness – the worsening of conflict. The Board proposal process appears to heighten conflict within contentious fisheries as groups grow frustrated with their failures and interactions with opposing sides. One example of this conflict can be found in Cook Inlet, a region notorious for its active and aggressive Board participation. Instead of demonstrating the advantages of stakeholder engagement, Cook Inlet demonstrates what happens when the commercial and sport fishing communities increasingly distrust each other, and Board-generated conflict escalates into court battles. The highest number of proposal submissions with the lowest success rates is seen in Cook Inlet. Many grievances that first appeared as failed Board proposals have ended up in the court system (e.g., ADN 2014, ADN 2015). The frequency of Cook Inlet fisheries court cases indicates that the Board process is not helping to resolve allocation issues – in at least one of Alaska's regions. In fact, the Board process may unintentionally worsen conflict.

Given the Cook Inlet scenario, it is possible that one stakeholder engagement approach does not fit all. In highly contentious fisheries with fierce allocative struggles, stakeholder engagement may need to consider a drastically different approach with much different objectives. As mandated by their regulatory framework, any change to the Board process requires the cooperation of the Joint Boards of Fisheries and Game. Since the Boards likely have different experiences and outcomes, this could be difficult to achieve. Another factor that complicates a redesign is the regularly occurring

turnover of Board members. Despite these challenges, the Board and greatly benefit from a thoughtful consideration of these findings because in addition to creating a more equitable and sustainable process, it could make their jobs easier.

Achieving the 3 E's could prove problematic when they contradict each other. For example, if the public is given more time to comment on proposals, this could impact the overall efficiency of the process. These concerns could be addressed by specifying the objectives to create a balance between competing needs. Then the existing and potential advantages and disadvantages can be monitored.

While we focused on the disadvantages of the Board process in this paper, advantages do exist. When compared to other public groups, the Advisory Committees appear to be functioning as well as they can within the current system. Regions with fewer stakeholders and less contentious fisheries have relatively high success rates for non-state entities. Major fisheries management issues have been resolved through the Board process. These glimmers of hope allow us to envision what the process could become in the future.

## Conclusions

The future is rocky and strewn with bureaucratic mountains but not impossible to navigate. The first step is admitting that there is a problem. This proposal dataset shows that skewed or nonexistent definitions of success may be hiding the disadvantages that exist within stakeholder engagement processes. Agencies would benefit from defining success through a clear framework of goals and objectives prior to engaging stakeholders. The dataset also suggests that an open public process is not always inherently good. Serious issues with equity, efficiency, and effectiveness can and do exist. The evidence provided in this paper is a strong indicator that stakeholder engagement could potentially be causing harm through a number of actions, such as (1) reinforcing institutional biases that stifle diversity and inclusion, (2) encouraging repetitive and failing proposals that lead to declining participation, and (3) worsening stakeholder conflict.

Once the problem is acknowledged, qualitative and quantitative analyses can build a strong and sustainable foundation for the 3 E's of stakeholder engagement. As analytic efforts like this one move forward, we encourage managers to collect and collate relevant demographic data in their stakeholder engagement processes. These data are essential to understanding how public processes function. As more approaches to analysis are revealed, we also encourage researchers to provide accessible datasets with transparent methods. In addition to producing the technical datasets, it may be beneficial to build apps, such as R Shiny, that allow more people to interact with the data. Conducting additional qualitative analyses may help to further explain the results and aid managers and participants in the restructuring of stakeholder engagement processes.

While we focused on a single case study, we believe that further investigation into other stakeholder engagement processes may reveal a global need for increased accountability. Until success is defined and the processes are assessed, claims of success or failure have the potential to aggravate already contentious natural resource issues. It is easy to dismiss some processes as failures and celebrate others as successes, but the truth is that both management and the public increasingly need more equitable, efficient, and



effective stakeholder engagement. By adjusting and modernizing our approach work toward enacting transparent and accountable public processes that produce the advantages commonly associated with their success.

## Acknowledgments

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**Submitted by:** Diana Kuest

**Community of Residence:** Anchorage, Alaska

**Comment:** I'm a resident since 1972. Dip netting and river fishing was and still is a must to build healthy families, activities for outdoor participation, and survival uses and skill development in each person that has that interest and sharing the growth of that participation. Learning, participating, growing and sharing these activities teaches a lot about our environment and uses for personal gain and commercial gain. No one manner of participation should be locked and blocked from another resident of this state.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. But more than this, your actions in the past and now has proven that your intent is to deprive every man, woman and child in Alaska a dietary product of high quality, "the Copper River Reds" that can be retrieved from a natural setting with their own personal fishing initiative without the aid of commercial fishing boats and processors. The Copper River Reds have been removed from the market for the average consumer in Alaska to buy at the grocery store shelves or refrigeration because you have given all caught "reds" to processors that sell to Foreign countries or are owned by foreign countries. The Alaskans do not see that fish on the market anymore but commercial fishing has contracted to these entities of foreign commerce for all catches whether the commercial fishing person works the catch himself or contracts just to receive money. The market in Alaska has been broken by these methods and standards. Fishing in different areas of the state like Southcentral and Southeast has come to the same terrible crime against the residents of this state. The leaders of this state have given more to the Foreign commerce than to the residents. What you have proposed is simply blind greed and thoughtless in every way.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a natural resource that person is entitled by law to use. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder making it ridiculous. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen. So, fishing allowance numbers of fish per person and methods need to be reworked to accommodate the common man. Not the common commercial fisherman and processor of foreign means.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Vote NO on those proposals. I have commented before and those proposals are damaging to the use and participation of individual house holds to sustain their food source, recreation and over all health and happiness. Vote NO!!!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and



access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Ernie Lannet

**Community of Residence:** Kenai/Anchorage, AK

**Comment:** We Love fishing the Kenai, and fishing mostly with family and friends. This fishery has provided a lot of food and enjoyment for our families. This is one of the best privileges for the Alaskan residents. We have come to count on our annual catch.

I think new rules and procedures should be set up for the set-nets and people who set their nets so close to the river mouth and approaching salmon routes to getting up stream to spawning.

Can I ask, how many of these are Alaskan set-netting permits are Alaskan residents? I have been down on beach and saw a lot of vehicles licensed in Washington and Oregon.

Do they have free beach parking or could they be fishing? What go's?

Thanks

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.



If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** John & Gail Lannet

**Community of Residence:** North Pole Alaska

**Comment:** We strongly oppose restricting or prohibiting access and opportunity to secure food for our family and our many Alaskan families,, we fish in the Kenai area with family & friends: many of our friends fish on the copper river: please don't oppose or restrict our fishing; thank you: John & gail lann

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.



**PC268**



*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
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Proposal 87:	Proposal 160:	Proposal 168:
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Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Eric Lannet

**Community of Residence:** North Pole alaska

**Comment:** I am a avid hunter and fisherman. I use wild game and fish to support my family. I fish in Kenai dip neting and that is a large part of my family's food through the winter. I fish with my family every year. We all get together and harvest our fish for the year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Richard Larson

**Community of Residence:** Kenai

**Comment:** I am 77 years old and eat sockeye salmon with most meals. I dip net in lower area of the Kenai. I take others who not fish from the crowded swift water to flip. We are tired of a few commercial guides taking our fish..we live hear and are Alaskans!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
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Proposal 169:

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**Submitted by:** Fred Larson

**Community of Residence:** Anchorage Alaska

**Comment:** I sport fish in many areas of the state, both fresh and saltwater. I feel that the fish belong to everybody. The commercial fishermen are asking for too much. Our salmon runs get smaller every year and it's not sport fisherman or subsistence users taking as many fish as possible. Commercial fishermen need to be restricted to allow our fish species to try to recover. You can't expect to have unlimited fish forever when you're killing all the breeders.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Rich Lassahn

**Community of Residence:** Kenai, Alaska

**Comment:** Most of the residents in our area are feeding our families with fish we harvest and cannot afford to have this taken away.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
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Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Robert Latto

**Community of Residence:** Anchorage, Alaska

**Comment:** Proposal # 163: These are not sport fishermen, these are meat on the family table

fishermen

Proposal # 164: This is not a commercial guide operation as such, this is just a day to day transport business while fishing and a way to the fishing spot.. Also the retained fish are already being counted and entered in the bag limit section of the dipnet permit prior to leaving the fishing area, and the tails cut off ...

Proposal # 165: First of all the fish in question be long to the state of Alaska as they are in State waters in the fishery.. Therefore the residents of Alaska have first choice of harvest to put food on their table and if any fish left over then a commercial license being either resident of Alaska owned or a resident of any state can harvest them ... Both harvests are subject to a sustainable escapement ..

Proposal # 166: There already is a bag limit set for each fishery and for each type of fish.. These bag limits have to be carefully orchestrated as they have to be noted on the catch page of the dipnet permit which has to be on the person fishing and prior to leaving the fishing catch area ... And the fish tails cut so as to mark the fish as personal use or subsistence use...

Proposal # 167: This 5 day reporting is moot .. The Alaska F&G regulates these dipnet fisheries by the abundance of fish across the sonar counter .. In all cases if the number of fish entering the harvest area is not up to sustainable numbers the fishery is closed by emergency closure ...

Personal opinion: The State of Alaska F&G has done a great job of managing the state salmon fisheries .. There are now more salmon returning to State waters than ever ..

Were it up to the greed of the commercial fisherman there would be no salmon returning .. But there is plenty so all fishers can get their share .. The residents of Alaska should not under any circumstance have to buy their fish from a non-Alaska resident fisherman just because the commercial has a permit to catch salmon to sell ... Us Alaska residents are the owners of this great state and her bounty...

Robert Latto

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Frances Law

**Community of Residence:** Fairbanks

**Comment:** I am a lifelong Alaskan. My family and I have been dipnetting on the Kenai and Kasilof since I was very young. This has provided us food for the winter every year seeing us through various economic recessions and difficult years. When we fish we usually share with our elders and others who we're not fortunate enough to fish. Regardless if it comes from our own limit or proxy's. I have never limited out but we all still share what we have. Last year I dipnetted every weekend. Most of the time I only got a one or two. Very expensive fish coming from 500 miles away. This was due to the commercial boats out everyday even on weekends. So called emergency orders. I came home with a total of 13 for the season using both a boat and shore fishing. My limit was 45. The very last day I witnessed the boats coming in late in the evening. The shore dipnetters finally started to catch fish after I packed up and gave up. Last year was supposed to be a high year for the number of reds counted. When the commercial boats go they decimate the number of fish that reach the mouth. There is no

way possible that we as dipnetters can possibly affect the salmon population the way these commercial companies do. This was the worst year for salmon harvesting by shore for sure. The only reprieve was for the people who stayed out there standing in the river long enough that the commercial boats came to drop their full catch off and return. I am sure they all made their money. I would love to see the restrictions be for the protection of the salmon not for the commercial industry. We can sustain this fishery if we cut out the greed of the commercial industry and start realizing that we all need to do our part. Especially the commercial side who take far more than the dipnetters ever could with a 5 foot hoop net.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Anthony Lay

**Community of Residence:** Anchorage ak

**Comment:** I am a resident of this state and at my church many can not afford to purchase fish . I help many seniors with fresh fish they can not afford at the prices we sell or seafood to locals I can't either this is a stable for many family's. It would be unjust to target the locals but let comerial fisheries run rampant as they have for years.

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Proposal 12:  
Proposal 13:  
Proposal 82: Oppose

Proposal 87: Oppose  
Proposal 153: Oppose  
Proposal 154: Oppose  
Proposal 155: Oppose

Proposal 156: Oppose  
Proposal 157: Oppose  
Proposal 158: Oppose  
Proposal 159: Oppose



Proposal 160: Oppose  
Proposal 161: Oppose  
Proposal 162: Oppose  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168: Oppose  
Proposal 169: Oppose



**Submitted by:** James Ledford

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** James Lewis

**Community of Residence:** Anchorage, AK

**Comment:** My name is Jim Lewis and I am a lifelong resident of Alaska for 50 years now. Our family has fished our entire lives and we live to do this and love to do this as a family. We get the best protein in the world from these fish and love to cook and eat it every week of the year. This would not be possible for us without the charters for dipping on the Copper River. We have specifically gone with Captain Ryan Ford of Rock Skip Adventures who is always about the safety of his clients. Captain Ryan also follows the rules and regulations to the letter and always obeys the laws regarding limits and what type of fish can be kept. We have gone with him for the past 5 years and we feel much safer than fishing from a cliff or the shore where it seems every year someone falls in and drowns. Please keep this fishery open for us.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles

and prohibiting safe access is unnecessary and quite frankly, malicious. These commercial fisherman have priced copper river salmon out for me if I was to buy at market prices and this is the only way I could ever afford this particular fish.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** C. Russell Lewis

**Community of Residence:** Anchorage, AK

**Comment:** A. I oppose Proposal No. 163 regarding regulations prohibiting guiding for personal use fishing. This would effectively bar access to this fishery for many current users

B. I oppose Proposal No. 164 regarding reporting, recording, and related requirements for guides in the personal use fishery. These fisheries have been successfully managed through self-reporting and sonar counts (along with regular closings and openings). Additional burden on guides (which will increase cost and burden on users) is not needed.

C. I oppose Proposal No. 166 regarding the "statewide bag limit" on personal use fisheries. This proposal is addressing a problem that does not exist: Each personal use fishery is managed by leading indicators (i.e. counts either sonar or weir) and only if those indicators are satisfactory, will that fishery open. A comprehensive limit is a burden on users that is not justified nor required to properly manage each fishery.

D. I oppose Proposal No. 167, relating to interim, in-season, and immediate reports of personal use fish taken. As with other proposals, this is a solution in search of a problem that doesn't exist and would not add benefit to the current management of the personal use fisheries.





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Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Destry Lind

**Community of Residence:** Anchorage Ak

**Comment:** Our family has lived in Anchorage and or Homer for the past 51yrs. Since the 70's we have had property/cabins on the Kenai River and since the 90's Willow Alaska. We fish in the salt and freshwater every year, several times with family and friends.

As far back as I can remember our personal use fishing rights have been slowly restricted and even completely shut down in some cases, each and every year.

As near as I can tell all the restrictions placed on our personal fishing rights have come at the request of the commercial fishing industry.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Holly Lind

**Community of Residence:** Anchorage, AK

**Comment:** We fish as a family (dip netting) in Kenai and Chitina. Last year we went to 1 king salmon per family vs the year proper it was 5 salmon per person. The limitations expanded each year that infringes on one of the best memories we make every summer as a family and fill the freezer with food. Please reconsider.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Justin Lindell

**Community of Residence:** Wasilla, AK

**Comment:** I have been going to Chitna to get my fish since 2002. It has turned into an annual event with family and friends and we use a charter for safety and convenience.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jana Linfield



**Community of Residence:** Anchorage

**Comment:** Our family fishes the Kenai every year and we depend on the salmon we catch to get us through the year. We follow all laws and have not experienced any bycatch in the years we have fished (dipnetted).

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Gus Linville



**Community of Residence:** Cordova AK

**Comment:** I suppose reporting and bag limits

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Proposal 158:  
Proposal 159:  
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Proposal 162:  
Proposal 163:

Proposal 164:  
Proposal 165:  
Proposal 166: Support  
Proposal 167: Support  
Proposal 168:  
Proposal 169:



**Submitted by:** James (Todd) Lirette

**Community of Residence:** Anchorage, AK

**Comment:** I don't own a boat, nor am I a native with access to a fishwheel, nor am I commercial fisherman. I'm also older with no longer my youthful knees and feet to hang off a rope on the side of the Copper River. So my only way to harvest fish on the Copper River is by utilizing a charter service like AK Expeditions. I go with them because they have excellent equipment, are very professional, and very ethical in helping families like mine harvest salmon. I've been going with them for a few years now and we used to be able to dipnet above the bridge in Chitina, until last year when B of Fs decided we had to go below the bridge...and now they want to close it off completely? I've been a resident of Alaska for 40+ years and all three of my kids were born in Alaska, along with my wife as well. Closing this off to families like mine is unacceptable and doing so sets a bad precedence by closing off a valuable resource that this Alaskan family depends on. If you need to restrict the harvesting of salmon on the Copper River, why don't you look at putting restrictions on the commercial fishermen that are harvesting the salmon for profit, instead of trying to completely shut off everyday Alaskan families like mine that are just trying to put food on the table.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
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Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Lizzie Davis

**Community of Residence:** Kenai,

**Comment:** My niece always gave me sockeye salmon after they Dip netted. I was so happy last year I bought a Big Chief Smoker and smoked and canned them all! I am eating and enjoying the taste of summer now. I am a senior and have Permanent Fishing License now and looking forward to going & catching my own fish now! Don't take this important tradition away from all the Alaskans that migrate here every July. Thank you.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them

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Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Thomas Llanos

**Community of Residence:** Anchorage

**Comment:** These are bad proposals all around.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Jessie Loewen

**Community of Residence:** Eagle river, Ak

**Comment:** I have lived in alaska my whole life. I grew up fishing with my dad in Seward. Now as a mom to two boys my husband and I take our whole family fishing throughout the summer from snagging in Seward to dip netting in Kasilof. It is something we do as a family and we do it to fill our freezers to last the long winters.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. It is our right as Alaskans to use our states resources to feed our family and community.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Curtis Loewen

**Community of Residence:** Eagle River, Ak

**Comment:** I fish to provide fresh food for my family at many different locations all over alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Lokeni Lokeni Jr

**Community of Residence:** Barrow

**Comment:** I'm a Samoan and I moved with our family here to this beautiful Alaska State for better life and to enjoy what Mother Earth has to offer to all of Alaska residents. Hunting and especially fishing helps provide food source for our way of life. Fishing guides or hunting guides helps our residents and my family to access remote hunting/fishing grounds.

As a Barrow resident, we depends on the Copper River subsistence fishing annually for consumption throughout the year. And having a fishing guide helps us getting some if not our goal limits every year. I oppose the proposal 163-167 for those reason.

I believe these proposals are controlled by the wealthy fish companies to control and forced our residents to buy fish from stores.

Alaska Residents should have the right to pay for FISHING GUIDES to access there fishing ground of there choice, not gets Dictate by a board on who they pay or how they gets to there fishing ground of choice. Not everyone has the luxury of having a boat or plane to get to remote fishing and hunting grounds.

We should be focusing on BANNING FISHING Trawler companies from ripping our SEAFLOOR along our coastline and destroying our ecosystem livelihoods. This is a double standard proposal for the wealth.

This don't do any goods for middle class and low income families in our State.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Timothy Lokker

**Community of Residence:** Fairbanks, Alaska

**Comment:** Good day,

My name is Tim Lokker and I've been a resident of Alaska for 20 years. For my family and I the Chitina Personal Use Dipnet area is how we get our salmon for the year. The trip from Fairbanks to Chitina is not a short, or inexpensive one, and we can only manage it once, sometimes twice a summer. If these proposals are allowed to go through it will make shore fishing even more congested and lower the numbers of fish we are allowed to harvest. This would make harvesting fish more difficult and quite possibly not worth the time and money, which would effectively remove salmon from my family's diet.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
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**Proposal 156:**  
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**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Benjamin Longeski

**Community of Residence:** Wasilla

**Comment:** My wife and I are both lifelong Alaskans. We love to eat salmon and make many different types of canned and smoked salmon to share with our family and friends. Being able to charter a guide to take me dip



netting since I don't have a boat to dip net in the Copper river has been very useful. The copper river is very dangerous and treacherous and to have professionals who are familiar with the river has made fishing there much safer. Why should the commercial fisherman be able to catch so much more than the resident sports fisherman?

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Sandra Lowe

**Community of Residence:** Wasilla

**Comment:** I am an Alaskan Native, Koyukon Athabascan, from Galena, Alaska. Unable to fish our mighty Yukon River has left my family out there with empty freezers and no smoke in the smoke house. I would fly home and help my family in the summer to put fish away, now we use the Copper River to subsistence for our family. Im trying to teach and preserve our native culture while living in the city of Wasilla with my family. I am thankful for the opportunity to provide for my family. For safety and convenience we charter Ak Expeditions.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jaclyn Lumba

**Community of Residence:** Wasilla, Alaska

**Comment:** I grew up fishing on the Yukon river. I now fish on the copper river along with my sisters family and we rely on the fish to help feed our children and our parents who can't fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Patrick Lumba

**Community of Residence:** Wasilla, Alaska

**Comment:** In 2021 we moved from Galena, Alaska on the Yukon River, where subsistence salmon fishing opportunities have dwindled. Now on the road system we fish the Copper River and Kenai River for salmon to feed our large family with traditional food. We save a lot of money and time by fishing with Alaska expeditions charters on the Copper River.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 153:  
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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Dan Macdonald

**Community of Residence:** Bellingham, Washington

**Comment:** Proposal 13

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13: Oppose  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163:

Proposal 164:  
Proposal 165:  
Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:



**Submitted by:** Tom Mader

**Community of Residence:** Cooper Landing, AK

**Comment:** I fish in the Kenai River area to harvest food for my family. Any attempt to restrict my fishing is a threat to me personally.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:  
Proposal 82:  
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Proposal 153:  
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Proposal 157:  
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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Chuck Mailander

**Community of Residence:** Fairbanks, Alaska

**Comment:** I have been a resident of Alaska for 59 years and feel it is not appropriate to restrict personal use fisheries.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and

access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
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**Proposal 157:**  
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**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Esther Maka



**Community of Residence:** Anchorage

**Comment:** My name is Esther I was born in Anchorage, Alaska. My children are half native Alaskan. We have been dip netting on the copper river and kenai river for generations for our winters. This is very sad to hear a proposal would ever be made to ban RESIDENCE from dipnetting.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 12:**

**Proposal 13:**

Proposal 82:  
Proposal 87:  
Proposal 153:  
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Proposal 155:  
Proposal 156:  
Proposal 157:

Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Bruce Malard

**Community of Residence:** Sterling, AK

**Comment:** Proposal 163- I support alternatives 1,2&3. Definitely NOT #4.

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Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162: Support  
Proposal 163:

Proposal 164: Oppose  
Proposal 165: Support  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168: Support  
Proposal 169:



**Submitted by:** David Malchoff

**Community of Residence:** Anchorage

**Comment:** Hello, I'm David Malchoff my family of seven. We rely on the dip net charters to get our limit of salmon for the year we fish on the Chitina river with our guided service. They provide a safe access to get the fish I need for the year I go with Alaska expeditions, I also fish the Kenai river to continue to get our salmon for the year as it is our main staple of food, as I live in Anchorage. This is the easiest access for myself and family to get to get our food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** James Male

**Community of Residence:** North Pole, Alaska

**Comment:** I fish to eat. I dipnet on the Kenai as my age prevents me from churn's dipnetting. I do not support the commercial fisheries taking anything from Alaska Residents.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Jopet Manseguiao

**Community of Residence:** Anchorage, AK

**Comment:** We enjoy the “ family time” spent while dip netting at Copper and Kenai Rivers. It’s our ONLY enjoyment during the short summer months. To take this away means expose my family to the dangers of wildlife-Bears while “flossing” on the Kenai & Russian rivers. TOTALLY OPPOSE!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan’s rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Sarena Mapes

**Community of Residence:** Fairbanks, AK

**Comment:** Oppose 163 and 165

Banning charters in all personal use areas significantly limits access to AK residents ability to self sustain, something Alaskans take great pride in, and increases the likelihood of more people taking great risk, especially on the copper river, in attempt to scale cliffs or safely captain a boat down the canyon.

Oppose 164:

Unnecessary regulation for a handful of charters running



Oppose 167:

People often make multiple trips in the course of a season to reach their limit. Not to mention the rural nature of Chitina and most of AK. Numbers are already currently closely monitored and the fishery is closed accordingly. I see no additional benefit to a 5 day reporting system.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Jeff Markusen

**Community of Residence:** Blaine Washington

**Comment:** I support 154 because it opens up more options for crew members that might be physically challenged it is a lot less physical work and does not have a advantage to the power block like it used to the power block has advanced in the last 25 years it is probably more efficient than the drum but I see no reason not to be able to use the drum to haul the net in it is used by all the Gillnet fisheries in alaska and the trawl fisheries it is a old law and I hope it is changed thanks

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Proposal 12:	Proposal 157:	Proposal 165:
Proposal 13:	Proposal 158:	Proposal 166:
Proposal 82:	Proposal 159:	Proposal 167:
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154: Support	Proposal 162:	
Proposal 155:	Proposal 163:	



**Submitted by:** Patrick Marre

**Community of Residence:** Kasilof

**Comment:** Love to fish and the out

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Andre Marron

**Community of Residence:** Anchorage, AK

**Comment:** We are lifelong Alaskans, we rely heavily on subsistence fishing among other opportunities to utilize what Alaska has to offer. Restricting or banning personal use or subsistence fishing will have a significant impact on families abilities to put affordable food on the table especially with todays inflation and market. The targets for reducing a dwindling fisheries shouldn't be personal use or subsistence it's the commercial fishing vessels, they alone have the most impact on annual numbers. Allowing this ban to happen would impact families all throughout the state.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Verne Martell

**Community of Residence:** Girdwood, Alaska

**Comment:** I have lived in Alaska for 45 years, mostly in Anchorage, Girdwood and spend any bonus time fishing on the Kenai. Lisa Murkowski is my wife. I ran the Ship Creek derby salmon tagging operation for quite a few years. I'm on the Kenai River Sport Fish board of directors. Wild game and fish are a big part of what we eat and feed to guests especially fish in Washington DC. It is special to say we caught what you are eating and it would be sad to buy it if you approve 163-167.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Rosemarie Martell-Greenblatt

**Community of Residence:** Fairbanks

**Comment:** I've fed my family for at least 31 years on salmon from the Copper River. It is a privilege I do not take lightly. I fish with family, friends and try to recruit new dipnetters whenever I go. I hope to continue fishing for many years to come.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Josh Martin

**Community of Residence:** Soldotna, AK

**Comment:** I have been fishing on the Kenai river and others around the state for most all of my life, (42 years). I have personally relied on subsistence dip netting to feed my myself and my family and believe that the resources can be shared responsibly. I have used boats after many years of beach, and bank fishing. I think a boat used responsibly can cause far less damage to the fishing grounds.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Robert Masneri

**Community of Residence:** Anchorage

**Comment:** I am. Life long Alaskan. I live in Anchorage and Sterling Alaska. I have participated every year in the personal use fishery on the Kenai Peninsula and also some in the Copper River. I'm a sports fisherman. My family commercial fished from 1962 to the mid 90s starting in Cook Inlet. I believe that the Cook Inlet commercial fishery should be totally shut down and leave the fish in Cook Inlet to the residence of the state of Alaska for personal use and sport.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jeremiah Maxwell



**Community of Residence:** Anchorage, Alaska

**Comment:** I go to the Chitna on a charter every year it helps me feed my family for the year. With inflation and grocery prices this is a must have more than ever nowadays.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 159:  
Proposal 160:  
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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kimmialuk McAlister

**Community of Residence:** Anchorage, Alaska

**Comment:** I'm a life long Alaskan (43 years old). I've been fishing all over Alaska, primarily on the Kenai Peninsula. I always fish with family who are also life long Alaskans. We depend on the salmon we catch to sustain us through the winter. I eat salmon on a weekly basis. I look forward to sharing the experience of fishing with future generations of my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jamie McCloud

**Community of Residence:** Seward

**Comment:** Hello, I am a local Fisher and I look forward to the runs every year. It's a wonderful part of my livelihood to be in the environment and securing valuable food for the winter to come.

The best way for resources to get to the people is for the resources to go directly to the people. Each subsistence Fisher takes such a small amount from the ocean compared to any commercial fishery. To maintain a healthy ecosystem I would support curtailing corporate activities before targeting individuals who respect the limits and put the food to direct use.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Patrick McCormick

**Community of Residence:** Anchorage, Alaska

**Comment:** BOF Proposal Comments.

Proposal 154.

I am opposed to this proposal. Seiners enjoy the highest catching power of any salmon fishing gear group. Increasing their catching power and reducing necessary crew will unfairly impact other fisheries. It will reduce the number of jobs in the fishing industry, and further concentrate access to the public resource to those with capital. The status quo allows Alaskan's unprecedented access to commercial fishing by having a large number of crew necessary.

Proposal 157 and 158

I am opposed to these proposals. Even though the effect of passage of these proposals would possibly increase the value of my area E drift gillnet permit. Further concentrating salmon permits would further concentrate the access to commercial fishing and only allow those with capital to participate in commercial fisheries.

Proposal 159





I am opposed to this proposal. There are several areas that are open to commercial fishing that would be inappropriate to have open to sport fishing. A blanket regulation would cause difficulties for the department in managing commercial fisheries effectively. Commercial fishing closures should be on a case by case basis.

#### Proposal 160

I am opposed to this proposal. Aside from the lack of mechanism to identify feeder king salmon, in general commercial gear other than troll is not effective in catching king salmon. Furthermore most king salmon caught in no target areas command a very low price and are subsequently retained for personal use. As an area E drift gillnetter my average annual king catch outside of the copper river district is lower than most experience sport fishermen's daily catch. Furthermore due to the language of the proposal it would be very hard to distinguish feeder kings from terminal king salmon in southeast troll fisheries, where a size limit is already in place.

#### Proposal 162

As a sport fishing guide on the kenai river I support this proposal, simplifying regulations is much appreciated.

#### Proposal 163

I am the author of this proposal and strongly support it. As a sport fishing guide and a commercial fisherman I have seen my business significantly damaged by increasing allocation of salmon resources to personal use fisheries. I wish I could come to the meeting and testify in person but because of policies of the board of fisheries I can not make a living commercial fishing. Allowing those who have no regulatory oversight commercially fish for salmon is wrong. Make no mistake guiding people using a gillnet even if it is contained in a hoop is commercial fishing. Many personal use fisheries such as the Chitna (Gulkana Hatchery), Kenai River (Hidden Lake enhancement), Juneau Area (Sweetheart Creek), Kachemak Bay (China Poot) personal use fisheries harvest hatchery salmon paid for by commercial fishermen. This causes a double hit to the pockets of commercial users, not only do we lose out on harvest opportunity to fish allocated away from us but we pay taxes and forego harvest opportunity on hatchery fish to pay for the fish we aren't allowed to harvest in the first place. Allowing commercial operations to harvest these fish is wrong. In my proposal I have included several alternatives to ensure a more fair management regime, all of which would take a step towards solving the current problems with personal use fishing.

#### Proposal 164

I am the author of this proposal and strongly support it. As a sport fishing guide I must be registered with the state and federal governments, I spend \$1400 for permits to guide on the Kenai River. Someone who is commercially guiding people who are significantly more effective at catching fish in the same drainage pays zero dollars and has zero oversight. My guiding operation harvests less fish per year than one client of a PU guide catches per day. My impact on other users is negligible compared to P/U guides. In my commercial operation I have caught less copper river sockeye in 4 years than the average P/U guide's boat catches in a day, yet I paid over \$100,000 to catch those fish and the P/U guide has paid nothing. This is fundamentally unfair and must be addressed.

#### Proposal 165

I am the author of this proposal and strongly support it. The board of fisheries addressed this issue in the Glennallen subdistrict and I encourage the board to move this statewide, affirming that subsistence fishing was never meant to be a commercial enterprise.

#### Proposal 166

I suppose this proposal, with an amendment to allow the department to waive this to harvest surplus hatchery salmon as the personal use statute intended by emergency order.

#### Proposal 167

I strongly support this proposal. As a fishing guide and user on the Kenai River I have seen the increase of popularity of the personal use fishery correlate with a change in run timing and a significant decrease in upriver fish returning to Kenai Lake tributaries. By not monitoring catch rates the department is denied a very important management tool which could be used to address these issues and better manage the fishery for maximum sustained yield by all users.

#### Proposal 168

I support this proposal. Some of my favorite sport fisheries are either mixed stocked/wild waters or stocked catch and release only water. Allowing the department authority to proactively manage stocked fisheries makes sense and should be implemented.

#### Proposal 169

I support this proposal.

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<b>Proposal 12:</b>	<b>Proposal 157:</b> Oppose	<b>Proposal 165:</b> Support
<b>Proposal 13:</b>	<b>Proposal 158:</b> Oppose	<b>Proposal 166:</b> Support
<b>Proposal 82:</b> Support	<b>Proposal 159:</b> Oppose	<b>Proposal 167:</b> Support
<b>Proposal 87:</b> Support	<b>Proposal 160:</b> Oppose	<b>Proposal 168:</b> Support
<b>Proposal 153:</b> Support	<b>Proposal 161:</b> Support	<b>Proposal 169:</b> Support
<b>Proposal 154:</b> Oppose	<b>Proposal 162:</b> Support	
<b>Proposal 155:</b> Support	<b>Proposal 163:</b> Support	



**Submitted by:** Erica McDaniel

**Community of Residence:** Anchorage, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 155:</b>	<b>Proposal 162:</b>
<b>Proposal 12:</b>	<b>Proposal 156:</b>	<b>Proposal 163:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 157:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 158:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 159:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 153:</b>	<b>Proposal 160:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 154:</b>	<b>Proposal 161:</b>	<b>Proposal 168:</b>

**Submitted by:** Shane McDonnell

**Community of Residence:** Anchorage, AK

**Comment:** Born and raised here in Alaska, 45 years here and I have watched the commercial fisheries kill our salmon population. This needs to be pulled under control just like the charter boats and the mass amount of fish that are taken yearly.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 12:**  
**Proposal 13:**  
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**Proposal 87:**  
**Proposal 153:**  
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**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Kristina McFadden

**Community of Residence:** Anchorage

**Comment:** My name is kristina McFadden and I was born and raised in anchorage, AK. We fish on the Kenai river to help provide food for my family during the long winter months. Fishing as been an Alaskan tradition since before I was born. Restricting it would devastate Alaskans statewide. I ask that you reconsider and take a look how this would negatively impact residents statewide

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Erika McKinsey

**Community of Residence:** Chugiak, Alaska

**Comment:** I fish because it helps provide food for my family & friends. It's a great outdoor activity. I fish in Kenai and I got with family and friends.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Susan McLane

**Community of Residence:** Fairbanks Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Bobbi Mcneil

**Community of Residence:** Anchorage, Ak

**Comment:** I fish subsistence every year for many years. I feed my family all winter from the fish caught. We love Alaska and love salmon. I've been here for 49 years.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed

their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Michael McPeck



**Community of Residence:** Wasilla, AK

**Comment:** I am a retired Alaskan resident who relies on the natural resources of Alaska for both hunting and fishing. I fish for food. I rely on the fish to help supplement my food needs, it is a means of survival for me as I have a limited income. I fish through conventional sport fishing and subsistence programs as necessary to feed my family. Sport fishing is not ample enough by itself to fill the void of our needed food requirements, current inflation and our economy is making it difficult enough to survive. The small numbers of Alaskan residents who dip net or use subsistence fisheries will never compete with the commercial fishermen's ability to fish. We can not compete with their machinery and ability to obtain large quantities of fish. I occasionally will use a charter to fish for Halibut when I can afford the cost of the charter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskan's opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten the rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kristin Mellinger

**Community of Residence:** Soldotna, Alaska

**Comment:** Personal use and subsistence fisheries are the most diverse fisheries in the State. Alaskan's from Utqiagvik to Akutan participate in these fisheries hoping to supplement the horrendous food bills required to feed their families in rural Alaska. With the devastating reports coming from other fisheries, it is unimaginable that we would vote to further restrict access to thriving salmon runs.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban these diverse Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Mark Melson

**Community of Residence:** Palmer, Alaska

**Comment:** 42 year resident that fish Sustina River, Seward, Kenia River, Nanilchik, Homer fishery's to provide food for my family. I normally go with friends and family.

Fishing is a way of life and means of feeding our families. I fish all over south central Alaska to supplement the family food source.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Chris Menter

**Community of Residence:** Palmer, Alaska

**Comment:** My family dipnets every year at the mouth of the Kasilof River. As Alaska residents we are entitled to the dipnet harvest prior to commercial exporters. Alaska residents should have priority over commercial and non residential fishermen.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Madison Michaelson

**Community of Residence:** Sterling, AK

**Comment:** I fish the kenai river every year. While I do not have a charter dip net business, I know those that do and this would take away their livelihood.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Nicholas Mikos

**Community of Residence:** Wasilla, Alaska

**Comment:** Alaska Resident for over 41 years. Dip-net Chitna every year for the past 7 years with Rock Skip Adventures. Due to my dietary restrictions I am able to subsist fresh salmon to eat with my family throughout the winter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:

Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** John Miller

**Community of Residence:** Fairbanks

**Comment:** I've been feeding my family on Copper River dinner caught salmon for many years. Since becoming a quadriplegic in 2016, I have relied on donations from several of part of their catch.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Melinda Miller

**Community of Residence:** Kenny Lake Alaska

**Comment:** We depend on this access and the fishing grounds for our food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 157:  
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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Harlan Miller

**Community of Residence:** Kenny Lake Alaska

**Comment:** I rely on fishing charters for safe substance fishing

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:  
Proposal 153:  
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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Lance Miller

**Community of Residence:** Anchorage

**Comment:** I fish for fun and family food. Presently I am a sport fisherman however I did commercial salmon dosing for two years as well.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Furthermore 166 is a why for families to economically provide food for their households.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Logan Miller

**Community of Residence:** Anchorage, Alaska

**Comment:** I'm a lifelong Alaskan and have been taking part in the personal use fisheries for the past 15 years or so. I go with my family and friends, and the salmon we catch makes up a significant portion of the food I eat throughout the year. Filling the freezer with subsistence-caught salmon is one of my favorite parts about living in Alaska.

I write to oppose proposals 163-167. In particular, I'm concerned about the limiting of guiding. I have gone dipnetting on the Copper River and used the boat guide service. It's a pretty intense river, and I felt safer and more responsible by paying a local to take us to a spot where we could fish. It also makes it more accessible, because I can't afford a boat and wouldn't otherwise be able to access that fishery in the same way. In sum, I think that certain guiding operations are reasonable and important for facilitating access for Alaskans to personal use fisheries.

I also generally oppose the statewide bag limit, unless there is evidence that households are abusing this privilege. In a family that relies largely on salmon for nutrition, it's not uncommon to eat hundreds of salmon per year. This is a vital food source and something that Alaskans need access to -- especially those with less food security.

If anything, I think there needs to be more efforts by the state to promote access to personal use fisheries for more Alaskans. It keeps people connected to the land and the salmon; it's a healthy and nutritious source of food security; and it brings families and communities together. We should be trying to increase opportunities for responsibly managed personal use fisheries, rather than restrict them.

Thank you for your consideration.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** William Minnette

**Community of Residence:** Eagle River

**Comment:** I do not agree with these as my wife and daughter are native and this would restrict access to a fishery that provides their traditional subsistence, that fishery being the copper river, and a charter is the safest and most efficient way for us to gather said fish. I feel that restricting access to this fishery is not only illegal, but also racist towards a large segment of minority people who use charters to access the copper river for their fish, and we would be forced to file suit against the state for taking part in a racist, colonialist, imperialist, measure to restrict access to people of color that use the charters, and advice all is just another case of white men trying to dictate when, where and how natives are allowed to fish. Therefore I am opposed to measures 163, 164, 165, 166, 167.

My family and I fish on the copper river, which is the best salmon in the world, we fish there because we love the area, have numerous friends that fish there, and most importantly, I believe this is the most well managed fishery in the state. We fish with ak expeditions because capt mark is a true professional, puts safety first, and is a veteran. Blocking dipnet charters will adversely affect my native wife and child from subsistence that goes back thousands of years, and I will view it as a direct assault on native culture, and will be forced to sue for



denying access to native Americans to a subsistence fishery, and it will go to prove that the board is racist and insensitive to native American needs.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access.

Proposals creating multiple harvest reports are excessive.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Marlene Minnette

**Community of Residence:** Eagle River

**Comment:** Born and raised Alaska Native, now living in the city where I must travel for miles to catch my subsistence fish. I utilize charters to get my fish for the winter for my daughter and I. I feel this is lashing out at the Alaska natives who use this to get their subsistence and now this is being taken away. This is my way of life, to gather and pass this tradition on down to my daughter. I feel like taking this away is going to definitely hurt our winter supply of fish. Not a lot of us has the transportation on getting our fish. Please consider those of us who don't have the means of transportation and must use charters to go out to gather.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jeremy Mishler

**Community of Residence:** Chitina

**Comment:** The charters in my town provides jobs for many locals here and they are a great for people that can afford it I for one would like to see them stay open for my future and for the sake of the community it helps by bringing tourism to our town and helps support local businesses it will hurt our town if they get shut down thank you for taking the time to read this

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.





Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Christopher Mizelle

**Community of Residence:** KENAI

**Comment:** I am a 54 yr. resident of Alaska and a 11 yr. resident of the Kenai Peninsula. I have sport fished the Kenai River since 1975 and have participated in the dip net fishery since the inception.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Lawrence Mock

**Community of Residence:** Anchorage, Alaska

**Comment:** I dipnet the Copper River as well as Kasilof River in Cook Inlet. I have been putting fish on my table from these rivers for over two decades. I am retired and am joined by my retired buddies who are all on fixed incomes. There is substantial financial savings when it comes to dipnetting, versus fishing with a fishing pole.

It's a good opportunity to secure a generous limit of fish to sustain your consumption needs for the year .

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Ben Mohr

**Community of Residence:** Soldotna

**Comment:** Thank you for serving on the Board of Fisheries. As you are aware, your decisions here have great impacts on tens of thousands of interested Alaskans. Alaska's fish are a common property resource, owned

equally by every Alaskans and managed as a public trust resource by ADF&G under your guidance. Under the public trust doctrine and the Alaska Constitution the Board is compelled to conservatively manage our fisheries resource for the greatest benefit of the greatest number of users. Restricting or complicating participation in personal use fisheries runs contrary to this charge.

I urge the Board to oppose Proposals 163-167. These five proposals seek to substantially restrict or ban opportunity and access to personal use and subsistence fisheries - fisheries which are limited to Alaskans only. As Alaskans in communities across our state struggle with food security introducing hurdles and prohibiting safe access is selfish, unnecessary and malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to inequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Stanley Montgomery

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Kasey Moore-Ritchie



**Community of Residence:** Wasilla Ak

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Reed Morisky

**Community of Residence:** Fairbanks, AK

**Comment:** Proposal 163- Oppose

This proposal would prevent many Alaska residents from participating in personal use fisheries. Alaskans food security would be needlessly restricted by this allocative proposal.

Proposal 164- Oppose

This proposal is unnecessary because it places an additional burden on users, would be challenging to enforce, and places needless additional budgetary and administrative burdens on the department.

Proposal 165- Oppose

This overly broad proposal has several issues, chiefly being that it has statewide implications in subsistence fisheries that may utilize rod and reel.

166- Oppose

This proposal would needlessly restrict Alaskans that wish to supplement their food supply with fish from different parts of the state. The proposer states in their proposal "... just like a person must choose where they want to hunt for the year, a household should choose where to fish and fill their bag limits".

A review of the current Alaska Hunting Regulations, indicates that except for a very few instances, that is simply not the case.

Proposal 167- Oppose

This proposal places an additional, needless burden on users, would be challenging to enforce, and places additional budgetary and administrative burdens on the department.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Scott Morrison

**Community of Residence:** Fairbanks, AK

**Comment:** 163, 164, 166, 167. I am opposed to the commercial industries attempt to harm small businesses operating in the Chitina dipnet fisheries. I am also opposed to their attempt to over regulate the sport fishermen. We already report our catch. Therefore, I am opposed to proposals 163, 164, 166, 167. Thank you. Scott

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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165:  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Ashlynn Mulcare

**Community of Residence:** Fairbanks, AK

**Comment:** My boyfriend and I usually only get one to two weekends a year to provide fish for the whole year due to working out of town. We choose to take a chartered serviced to increase our chances of getting the fish we need for the year. We have been taking a chartered dipnet service in the copper river for several years now because it is the safest and most efficient way for us to get our fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Eldon Mulder

**Community of Residence:** Anchorage, Alaska

**Comment:** Dear Members of the Board of Fish;

First, let me thank you for your service--I know first -hand that the commitment of time and energy required for public service and that it comes at huge personal sacrifice. My family and I are greatly for your sacrifice.

I am a 38-year resident of Alaska. My wife and I enjoy spending our summers on the Kenai River and have a long history with dipnetting in Alaska. We have hosted and taken literally hundreds of Alaskans from throughout the State out on the River harvesting the bounty of Alaska. Everyone uses the salmon they harvest to fill their freezers and feed their families through the year. Personal use harvested salmon is a vital food source for many Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Mary Mundell

**Community of Residence:** Ninilchick, Alaska



**Comment:** I have fished and hunted for over 30 years and in that time I have watched the Commercial fishing industry and the guide industry destroy King salmon, deplete Silver salmon, ruin Clamming, Crabs etc. I fish for myself and my family. I don't use guides and my fishing is for a subsistence lifestyle that only Alaska can offer. I don't think that guided operations are that important to Alaskans getting fish. Guides are mostly for outsiders and non residents. No Commercial fishing or Guided fishing for Salmon. Alaska fish are not for Sale!!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Julie Murphy

**Community of Residence:** Wasilla, Ak

**Comment:** We have chosen to charter with DipShip for the past two seasons- as my husband is a disabled veteran and with his bad back and shoulder cannot do the strenuous dipnetting along the banks. We chose to go on someone else's boat (a charter) as that is the most cost effective way for us to participate not owning a boat ourselves.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.





Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Cameron Muse

**Community of Residence:** Cooper Landing, Ak

**Comment:** Fly fishing guide on the Kenai River for 8+ years, born and raised lifelong Alaskan of 36 years.

I SUPPORT Proposals 163-167. Dipnetting is for "subsistence" yet is available to all residents of Alaska despite their income. Seeing someone in a brand new F-150 going dipnetting is obviously not someone who should be allowed to subsistence fish. As someone who lives in a rural community with well below average household income, it is disgusting to see this as well as the amount of freezer-burned salmon that shows up in the dumpsters every spring. Salmon are not an endless resource, and I don't know a single household that goes through 25 salmon a year, let alone the additional 10 that is allowed per household member. Perhaps a study about how much of this ridiculous amount of fish is actually eaten, not thrown away or shipped out of state, should be taking place if not doing away with dipnetting entirely.

Dipnetting should only be allowed to those who meet income or location requirements for other subsistence activities.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Support
Proposal 12:	Proposal 157:	Proposal 165: Support
Proposal 13:	Proposal 158:	Proposal 166: Support
Proposal 82:	Proposal 159:	Proposal 167: Support
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Support	



**Submitted by:** Vicky Musgrave

**Community of Residence:** Indian, AK

**Comment:** With my husband, 5 children, and now, 8 grandchildren, I have fished in Alaska since 1981; primarily on the Kenai R., Kasilof R., and Gulkana R. I have consistently participated in the Kenai/Kasilof personal use dipnetting, on shore and from a boat. Fishing has provided food for our family, fun, adventure, and appreciation for our environment. For 14 summers, when my husband was a drift boat fishing guide, fishing also provided a small income. All Alaskan residents should have generous access to our natural resources. Proposals 163, 164, 165, 166, and 167 puts limits on personal use and subsistence use of our fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

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10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

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22 February 2023  
On-time public comment  
2023 Statewide Board of Fish Proposals

Board of Fish,

The Native Village of Eyak (NVE) provides the following comments for 2023 Statewide proposals. The Tribe is Neutral on any proposals not addressed below.

**154. Opposed.** We believe this proposal will limit opportunity to work on seine boats, thereby limiting opportunities for younger crew to enter and work in the industry. This issue is of concern given the advancing average age of seine Captains and the need to create policies and regulations that facilitate creating employment opportunities.

**156. Support.** Felt soled waders are known vectors for invasive species and should be banned statewide.

**157. Support.**

**158. Support.**

**159. Oppose.** We oppose any automatic commercial fishing closure triggers that are not directly supported by empirical evidence. We especially oppose such triggers when Commercial fisheries managers already have the authority to make those closures.

**160. Oppose.** Salmon fisheries can be difficult to manage due to the challenges of managing mixed-stock fisheries, as well as intercepting other salmon destined for different areas. However surrendering proceeds, which are calculated after-the-fact will not result in conservation, only lost income in fisheries whose landings are already taxed. If Chinook salmon are being harvested at hatcheries managers are able to close those fisheries. If this issue exists at specific hatcheries it would be better to make adjustments there, rather than a single statewide solution to a problem that may not exist.

**161. Support.**

**163. Support.**

**164. Support.**

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10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

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**165. Support.**

**166. Support.**

**167. Support.** The Native Village of Eyak has long supported requiring timely reporting of salmon harvested across all fisheries and user groups, and as time passes and communication improves, any barriers to implementation are reduced. We understand that certain areas are not only without communications in the field, but also in their villages and support these communities being granted grace periods as timely statewide reporting of all salmon harvested is established as the norm.

**168. Support.**

**169. Support.**

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 154: Oppose  
Proposal 156: Support  
Proposal 157: Support  
Proposal 158: Support  
Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161: Support  
Proposal 162: Support  
Proposal 163: Support  
Proposal 164: Support  
Proposal 165: Support  
Proposal 166: Support  
Proposal 167: Support  
Proposal 168: Support  
Proposal 169: Support

**Submitted by:** Shaun Nelson

**Community of Residence:** Eagle River Alaska

**Comment:** Dipnetting is part of subsistence. Commercial fishing is about profiting off Alaska Resources. Maybe we would have more fish if commercial fisheries went away. I think honestly commercial fishing is why we're not seeing returns, We could probably prove that if we stopped commercial fishing. Subsistence hasn't done any damage, when compared to what we've seen over the last several decades.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Parry Nelson

**Community of Residence:** Kodiak

**Comment:** Proposal #158. Strongly support. There are hundreds of unfished limited entry permits out there and study's have shown that there is more older fishermen retiring than young fishermen buying in. If passed this would create jobs for more hardworking people.

Limited Entry came to be about 50 years ago and back then it may have made sense for each person to only be able to hold one permit. That was half a century ago... I see no down side to this change

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Proposal 155:

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Proposal 157: Support  
Proposal 158: Support  
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Proposal 164:  
Proposal 165:  
Proposal 166:  
Proposal 167:

Proposal 168:  
Proposal 169:



**Submitted by:** Margaret Nelson

**Community of Residence:** Anchorage, AK

**Comment:** Please see my support or opposition to proposals below. Thank you.

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Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155: Support

Proposal 156: Support  
Proposal 157: Oppose  
Proposal 158: Oppose  
Proposal 159: Support  
Proposal 160: Support  
Proposal 161: Support  
Proposal 162: Support  
Proposal 163: Support

Proposal 164: Support  
Proposal 165: Support  
Proposal 166: Support  
Proposal 167: Support  
Proposal 168: Support  
Proposal 169: Support



**Submitted by:** David Neuburger

**Community of Residence:** Delta Junction

**Comment:** Hello

I fish the Chitna personal use area and the last couple of years the Glennallen subsistence fishery. The last five or six years I used my personal river boat to access these dip netting areas. Before I purchased my boat, I used a charter service to access the Copper river. I used the charter service because I was not able to walk the steep slopes of the Copper river to my fishing areas. By using the charter service I was able to bring home my harvest of salmon and avoid the danger of packing fish up the slopes the Copper river canyon. I use to bring my grandchildren with me when they were living at my house and enjoyed taking and the help they gave me when dip netting with my grand children. Now I take a couple of friends with me that are in their late 50s and mid 60s and I'm in my late 60s. If I did not have a river boat and the fish charter boats are no longer available there would be no way for me to dip net any longer due to physical limitations .

By passing these these proposals the Board of Fisheries (BOF) would put an end to the people with physical limitations to access the dip netting areas

After reading the proposals 163-167 these proposals are in favor of the commercial fishery and overtly put a burden on the subsistence and personal use fishery. By allowing these proposals to pass the board of fishery is giving more power to the commercial fishery, and denying access to the subsistence and personal use area by limiting how the these users get to their fishing sites. By limiting or eliminating guides in these fishing areas, puts these guides into financial hardship by eliminating the guide service. The guides have a limited amount of time to earn a living by the service they provide to the people that use a guide to get to the places to dipnet.

I believe that the BOF should look into reducing the catch limits of the commercial fisheries for the next 5 to 7 years to increase the escapement limits of salmon and rebuild the fish population to a substantial population.

I believe that the BOF should vote not to accept any of these proposals 163-167 as these proposals directly impact the subsistence and personal use fishery and place a serious food source to the local people in jeopardy.

Thank you for your time to read my objection to the BOF proposals 163-167.

Dave Neuburger

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Lori Newton

**Community of Residence:** Anchorage, alaska

**Comment:** I fish every summer with a groups of friends via a charter. Without fishing charters it would make it impossible for us to Dipnet. Charters provide years of expertise and safety that is important when fishing on the copper river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.



Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** John Nobles

**Community of Residence:** Fairbanks

**Comment:** I need these fish to help feed my family I go every year and catch my limit. Banning dipnetting will take food off my table. We Alaskans are not catching that many fish in the scheme of things.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:



**Submitted by:** Northern Southeast Regional Aquaculture Association

**Community of Residence:** Sitka, AK

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

Northern Southeast Regional Aquaculture Association (NSRAA) is the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement hatcheries and projects. At our Fall 2022 meeting the 25 member NSRAA Board unanimously passed a motion opposing proposals 159 and 160. Both of these proposals are opposed by ADFG and proposal 159 is also opposed by the Alaska Wildlife Troopers. While these two proposals address different issues both of them are impractical if not impossible to implement, enforce and would increase the cost to manage both sport and commercial fisheries. NSRAA encourages the Board of Fisheries to oppose or take no action on these proposals.

Thank you for your time and service on the board.

Sincerely,

Scott Wagner

General Manager-NSRAA

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**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:** Oppose  
**Proposal 160:** Oppose  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:**

**Proposal 164:**  
**Proposal 165:**  
**Proposal 166:**  
**Proposal 167:**  
**Proposal 168:**  
**Proposal 169:**



## REVISED PROPOSAL 11

### 5 AAC 06.361. Nushagak-Mulchatna River King Salmon Management Plan.

Make amendments to the Nushagak-Mulchatna King Salmon Management Plan, as follows:

1. Define specific management objectives for the Plan by adding the language below to, or following, section (a) of the Plan:

**The department shall manage the Nushagak fisheries for the following management objectives:**

- 1) Provide consistent sport fishing opportunity within and among seasons. This includes a level of inriver abundance as a given year's run timing allows, and a predictably open season.**
- 2) Provide a directed commercial king salmon fishery when surplus is available.**
- 3) Provide for an uninterrupted commercial sockeye salmon fishery (i.e., minimize disruptions to the sockeye salmon fishery).**
- 4) Provide for reasonable opportunity for subsistence harvest of king salmon.**
- 5) The subsistence fishery is the last fishery to be closed.**
- 6) Achieve escapement goals for all species in the district.**
- 7) Maintain a representation of age classes in the escapement similar to the run.**

2. Manage large sockeye runs so that escapements fall in the upper portion of the escapement goal range, which would reduce incidental catch of king salmon, by adding new provisions to section (b) as follows:

**(X) Consistent with 5 AAC 06.367 Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan, the department in an attempt to conserve king salmon shall manage for sockeye escapements in the Nushagak District to fall within the**

**(1) lower half of the escapement goal range when the Wood River sockeye salmon run is 7 million or less and/or the Nushagak sockeye salmon run is 2.5 million or less, or the**

**(2) upper half of the escapement goal range when the Wood River sockeye salmon run is greater than 7 million and/or the Nushagak sockeye salmon run is greater than 2.5 million based on the preseason forecast and in-season assessment of run size.**

**(X) On or after June 25, the department shall consider when evaluating total run of sockeye salmon to the Nushagak District all possible data sources including but not limited to: pre-season forecast, Port Moller test fishery indices and stock and age composition, total C+E to date, age composition of C&E and district test fishing.**

3. Use a Nushagak District Test Fishery to assess relative abundance of sockeye and king salmon by adding the following new provision to (b):

**(X) From June 1 through June 30 the department in an attempt to conserve king salmon shall, to the extent practicable, conduct a drift gillnet test fishery to assess the abundance of sockeye and king salmon prior to opening by emergency order a fishing period directed at sockeye salmon.**

4. Provide a directed commercial fishery for king salmon when surplus clearly exists by modifying section (c) as follows:

- (c) If the total inriver king salmon return in the Nushagak River is projected to exceed 95,000 fish,  
**(1) the guideline harvest level described in (b)(1)(C) of this section does not apply[.], and**  
**(X) the department will consider a directed commercial king salmon fishery.**



5. Avoid complete closures of the sport fishery when possible by modifying section (e) as follows:

(1) shall [close]**restrict to catch and release**, by emergency order, the sport fishery **for king salmon** in the Nushagak River [to the taking of salmon] and prohibit the use of bait for fishing for all species of fish until the end of the king salmon season specified in 5 AAC 67.020 and 5 AAC 67.022(g); and

6. Provide the department with flexibility to restrict but not close the subsistence fishery in low inriver run scenarios and standardize subsistence fishing schedule and area under a restricted scenario by modifying section (e) as follows:

(2) [shall]**may** establish, by emergency order, fishing periods during which [the time or area is reduced for the inriver king salmon subsistence fishery in the Nushagak River]**the subsistence fishery is restricted to 3 days per week in the Nushagak District; and the waters above the district including Dillingham beaches, Wood River up to Red Bluff, and the Nushagak River drainage.**

**NEW PLAN****5 AAC 06.### (likely 391). Nushagak District King Salmon Stock of Concern Management Plan.**

- (a) The purpose of this management plan is to provide management tools and guidelines for the management of Nushagak District salmon fisheries, while Nushagak River king salmon are listed as a stock of management concern, that will result in the sustained yield of king salmon stocks large enough to meet sustainable escapement goals while allowing for harvest opportunity in the subsistence, sport, and commercial fisheries. It is envisioned that the Nushagak River king salmon stock of concern status and this plan would remain in effect until the king salmon escapement is within the escapement goal for three or more years.
- (b) While the Nushagak River king salmon are listed as a stock of management concern, it is the (board) intent that all Nushagak District salmon stocks are managed conservatively through June 28 to protect Nushagak River king salmon, consistent with the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222).
- (c) The department shall manage commercial fisheries in the Nushagak District as follows:
  - 1. To achieve an inriver goal of 95,000 king salmon in the Nushagak River consistent with the Nushagak King salmon management plan (5 AAC 06.361(b)(1));
  - 2. When the Wood River sockeye salmon forecast or inseason projection is less than 7 million the department shall manage for the current SEG of 700,000 to 1.8 million fish.
  - 3. When the Wood River sockeye salmon forecast or inseason assessment of run size is greater than 7 million the department shall manage to achieve a Wood River sockeye salmon OEG of 700,000 to an upper bound that is up to 10% of the Wood River total run size above the 1,800,000 upper bound of the SEG, based on the preseason forecast and inseason assessment of run size.
  - 4. When the Nushagak River sockeye salmon forecast or inseason projection is less than 2.5 million the department shall manage for the current SEG of 370,000 to 900,000 fish.
  - 5. When the Nushagak River sockeye salmon forecast or inseason assessment of run size is greater than 2.5 million the department shall manage to achieve a Nushagak River sockeye salmon OEG of 370,000 to an upper bound that is up to 15% of the Nushagak total run size above the 900,000 upper bound of the SEG, based on the preseason forecast and inseason assessment of run size.
- (d) Prior to 9:00 a.m. June 28, if the Nushagak king salmon inriver run size is projected to be less than 95,000 fish, the commissioner;
  - 1. Shall close by emergency order, the sockeye salmon commercial drift gillnet fishery in the Nushagak District, and the sockeye salmon commercial set net fishery in the Nushagak Section of the Nushagak District until:
    - i. The sockeye salmon sonar estimate in the Nushagak River is projected to exceed 6% of the Nushagak River sockeye salmon run based on the Nushagak River sockeye salmon preseason forecast and inseason assessment of run size; or
    - ii. The sockeye salmon count past the Wood River tower is projected to exceed 6% of the Wood River sockeye salmon run based on the Wood River sockeye salmon preseason forecast and inseason assessment of run size.
- (e) In the Nushagak River drainage, excluding the Wood River drainage,
  - 1. the annual limit for king salmon 20 inches or greater in length is four fish, of which only one fish may be 28 inches or greater in length.



2. If the total inriver king salmon return in the Nushagak River is projected to exceed 95,000 fish, the commissioner may increase the annual limit for king salmon to 4 king salmon 20 inches or longer (no restriction to one fish over 28 inches).
- (f) Subsistence fisheries will be managed in accordance with current regulations.

\* The purpose of the Wood and Nushagak OEGs is to conserve king salmon by establishing a range of acceptable sockeye salmon escapements above the SEG, in years of high sockeye salmon abundance. This allows the department to restrict commercial fisheries at times they would otherwise be fishing to control sockeye salmon escapement.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 11: Support With Amendments



# United States Department of the Interior

Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199



PC357  
1 of 7

IN REPLY REFER TO:  
OSM.23022JK

FEB 22 2023

Ms. Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Fisheries proposals and related issues during the 2023 Statewide Finfish Meeting.

The OSM staff, working with the other participating Federal agencies, reviewed each of these proposals. The attached document includes a comment from OSM regarding a proposal that has the potential to impact federally qualified subsistence users or associated fisheries within Federal Subsistence Management jurisdiction. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or fisheries.

Our comments are limited to issues affecting the Federal Subsistence Management Program (FSMP). Other Federal agencies may wish to comment separately on issues outside of the FSMP that may impact Federal public lands that fall under their management jurisdiction.

Again, we appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues.

Sincerely,

Scott Ayers  
Acting Assistant Regional Director  
Office of Subsistence Management



Enclosure

cc: Federal Subsistence Board  
Interagency Staff Committee  
Benjamin Mulligan, Alaska Department of Fish and Game, Anchorage  
Art Nelson, Alaska Department of Fish and Game, Juneau  
Mark Burch, Alaska Department of Fish and Game, Palmer  
Administrative Record

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 82: Support With Amendments



**RECOMMENDATIONS  
ALASKA BOARD OF FISH PROPOSALS**

**Statewide Finfish**

**March 10–14, 2023**

**Anchorage, Alaska**

**Office of Subsistence Management (OSM)**



## **PROPOSAL 82**

### **5 AAC 39.250. Gillnet specifications and operations.**

Modify the dates sinking of gillnets is allowed in the Yukon Area from October 1 to April 30.

#### **Current Federal Regulations:**

##### **§100.27(e)(3) Yukon-Northern Area**

\*\*\*

*(xii) You may take salmon only by gillnet, beach seine, dip net, fish wheel, or rod and reel, subject to the restrictions set forth in this section.*

*(A) In the Yukon River drainage, you may not take salmon for subsistence fishing using gillnets with stretched mesh larger than 7.5 inches.*

\*\*\*

\*\*\*

*(xiv) In Districts 5 and 6, you may not take salmon for subsistence purposes by drift gillnets.*

*(xv) In District 4 salmon may be taken by drift gillnet not more than 150 feet in length unless restricted by special action or as modified by regulations in this section.*

*(xvi) Unless otherwise specified in this section, you may take fish other than salmon by set gillnet, drift gillnet, beach seine, fish wheel, long line, fyke net, dip net, jigging gear, spear, lead, or rod and reel, subject to the following restrictions, which also apply to subsistence salmon fishing:*

\*\*\*

*(B) You may not use an aggregate length of set gillnet in excess of 150 fathoms, and each drift gillnet may not exceed 50 fathoms in length.*

\*\*\*

*(D) During the State commercial salmon fishing season, within the Yukon River and the Tanana River below the confluence of the Wood River, you may use drift gillnets and fish wheels only during open subsistence salmon fishing periods.*

*(E) In Birch Creek, gillnet mesh size may not exceed 3-inches stretch-measure from June 15 through September 15.*

*(F) In Racetrack Slough on the Koyukuk River and in the sloughs of the Huslia River drainage, from when each river is free of ice through June 15, the offshore end of the set*

*gillnet may not be closer than 20 feet from the opposite bank except that sloughs 40 feet or less in width may have 3/4 width coverage with set gillnet, unless closed by Federal special action.*

\*\*\*

**Is a similar issue being addressed by the Federal Subsistence Board?** No

**Impact to Federal subsistence users/fish:** This proposal is unlikely to decrease opportunity for federally qualified subsistence users because it will still allow for under ice fishing and gill net mesh depth is generally not restricted in Federal subsistence fisheries in the Yukon River drainage so deep waters can still be fished efficiently. Adopting this proposal would misalign Federal and State regulations, which may increase regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the 2025–2027 Fisheries Regulatory Cycle to re-align regulations if these changes are adopted.

**Federal Position/Recommended Action:** OSM supports Proposal 82 with the modifications outlined in RC056.

**Rationale:** This proposal as modified by RC056 is unlikely to decrease opportunity for federally qualified subsistence users and addresses the navigation safety concern of sunken nets.

**Submitted by Board Member Märít Carlson-Van Dort, prepared by the Alaska Department of Fish and Game<sup>1</sup>.**

January 17, 2023

The sinking of gillnets has been discussed for commercial, subsistence, and personal use fishing in the Yukon Area with Board Members, stakeholders, ADF&G and YRDFA. The following language is recommended for each section:

Commercial regulations (statewide):

5 AAC 39.250 is amended to read:

**5 AAC 39.250. Gillnet specifications and operations.**

(d) The float line and floats of gillnets must be floating on the surface of the water while the net is fishing, unless natural conditions cause the net to temporarily sink. The restriction of this subsection does not apply in the Arctic-Kotzebue Area (5 AAC 03.100), the Norton Sound-Port Clarence Area (5 AAC 04.100), the Yukon Area (5 AAC 05.100) **from October 1 to April 30**, the Kuskokwim Area (5 AAC 07.100), and the Kodiak Area (5 AAC 18.100).

Subsistence regulations (Yukon Area):

5 AAC 01.220 is amended to read:

**5 AAC 01.220. Lawful gear and gear specifications.**

(c) The following restrictions apply to subsistence fishing:

**(15) In Districts 1 and 2, the float line and floats of gillnets must be floating on the surface of the water while the net is fishing, unless natural conditions cause the net to temporarily sink from May 1 to September 30.**

**(16) In Districts 3–6, gillnets in operation sunk below the surface must have a red keg, buoy, or cluster of floats visible on the surface of the water at each end of the submerged net, and for submerged gillnets over 60 feet in length, a third red keg, buoy, or cluster of floats must be attached to the middle of the net.**

\*\*\*\*\*As written in RC 55\*\*\*\*\*



Personal use regulations (Yukon Area):

5 AAC 77.171(a) is amended to read:

**5 AAC 77.171. Lawful gear for personal use finfish fishing.**

(a) In Subdistrict 6-C, finfish may be taken for personal use only by set gillnets and fish wheels as follows:

...

**(7) the float line and floats of gillnets must be floating on the surface of the water while the net is fishing, unless natural conditions cause the net to temporarily sink from May 1 to September 30.**

---

<sup>i</sup> Preparation of draft substitute language at the request of a Board member does not imply ADF&G support. The Department will state its position on the language during deliberation.

**Submitted by:** Steve O'Hara

**Community of Residence:** Anchorage

**Comment:** I love sport fishing with my family throughout Alaska, particularly on the Kenai.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Stephen O'Hara

**Community of Residence:** Anchorage, AK

**Comment:** I live in Alaska to support the community in many ways. Technically and financially and community. I fish with my family, my employees, my kids and we use the fish as a major part of our Alaska way of life. Hence we choose to stay here during the tougher of times and commit to providing the needs of our community. Fishing is the way I have choose and the life I have choose to live in Alaska because of the resource available to me. If there is not the resource in area I reside with regulations that protect others while using the same natural resource as myself, then there is a issue.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and

access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

My support and work does not require a natural resource and yet is a staple to provide for the community and surrounding areas in the state. I live here year round and provide year round my skills to the community. The fishing is not year round industry. When we choose to limit who and how a natural resource is divided for others profit we have chosen to lose the growth of our community as a whole. This should not be about providing to one group or another over privilege's. or expectations that they are more important. Rather it is a resource that brings the community together as a whole. Like any business there are challenges, this may be one for the commercial industry- which has a large number of seasonal and non residents engaged in commercial fisheries. Where and what is the provisions they provide in the off season? A fact, the fish are not one or the others, last fish I caught did not say it was commercial or personal use. It was not raised by a personal hatchery or individual it was by a agency we all support, a federal agency. a business must learn to adapt, if this means sharing hours, sharing days or limited use then you adapt you business to follow. you don't take the resource from one or the other. That is business and the last time I checked the commercial fishery was not giving fish to me for free. IF we are going to limit the resource to one or the other then let the commercial hatchery provide the equal amount free of cost to the residence. The balance on who causes more waste and environmental impact is just as selfish as the hording a natural resource. There is beach damage, nets, waste, oil and many other impacts that are not measured or clearly visible. The personal use is a very isolated area and the impact is considerable less when you measure the later. Protecting the resource is in the interest of both, wasting time listening to proposals about banning or limiting our community and the natural resource should be thought of as a loss for all. As to protect the interest of the people who provide for the commercial industry in the off season. Without those who are not commercial fishery the interest of staying in Alaska would be several questioned. Hence the skills and work support we provide which is not a natural resource would be limited as if we not living in a area we value, as the resource was taken to provide for one group. Try hiring skilled technical labor in Alaska. Hence majority of the slope is not from Alaska. The discussion should be about protecting the resource, better enforcement, better eyes on perpetrators damaging the access or environment. Better control of our off shore waters.

The real change has come in the last few years, where we see less fish return to areas fished out, Seward, Kings in Kenai, the number of returns on the set nets. It is because we are not protecting our waters further out.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Either the commercial fishery hands out free fish or both groups are equal. Last fish I caught did not come from a commercial fishery hatchery. It came from a natural resource and was developed on a natural resource which is all o f ours to enjoy and protect. Not own.

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**Proposal 162:**  
**Proposal 163:** Oppose  
**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**

**Submitted by:** Roger Okamoto

**Community of Residence:** Sacramento, CA

**Comment:** This is yet ANOTHER power grab by commercial netters, they want EVERY Red salmon that swims upstream. When they kill 50,000 & only let 5,000 into the river they still want to kill MORE! This is disgraceful, it's a travesty! You (the Board) are supposed to be protecting the resource for all Alaskans who own the fishery, instead of being the puppets for the Commercial industry, do the right thing & vote down 163-167. I come up every summer to spend my \$\$ supporting the econ.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Anthony Oney

**Community of Residence:** Wasilla, Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Gonzales Orlando



**Community of Residence:** Chugiak

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:

Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose



Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Joseph Ortega

**Community of Residence:** Waxsilla Alaska

**Comment:** I support the CDA . I oppose to the new proposals

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Fred Owen

**Community of Residence:** Wasilla

**Comment:** I have been a resident of Alaska since July of 1999. I treasure the ability given me to fish and dipnet in this state. I fish in the Kenai, Matsu and Anchorage boroughs along with Prince William Sound and Cook

Inlet. I hope to fish Kodiak and the Panhandle soon. I love to fish to put food in my freezer and just for the joy of it. Sharing time with good friends and family while doing it.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Why should these groups of commercial fisherman have opportunities that limit the individual from their rights to fish in Alaska? I would suspect money is involved and I hope that those who are trusted with maintaining the Alaska fisheries are not involved in that. Instead they are the protectors of the rights of the individuals to use and protect our precious resource along with maintaining a healthy commercial fishery. The commercial should never take precedence over the individual persons rights ever!

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jesse Owens

**Community of Residence:** Wasilla, AK

**Comment:** I am a medivac aircraft mechanic. I have a family of seven. and I rely on dipnetting to have fish for the year. I use a charter to get the fish because I don't have enough experience to boat on the copper.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my

harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Corina Pace

**Community of Residence:** Palmer alaska

**Comment:** We fish down in Ninilchic mainly. We bring along the whole family, 3 kids and 2 dogs. We also go with our extended families that all live here in Palmer Alaska as well. It seems the commercial guys get more and more fish and the residents less and less.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**PC367**

**Submitted by:** Giacinto Paoletti

**Community of Residence:** Wasilla

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Arlene Patuc

**Community of Residence:** Anchorage

**Comment:** I love to fish but as I get older it is harder to fish in the river. A private charter allows me to subsistent fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Laramy Paulson

**Community of Residence:** Talkeetna

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Abbey Pawlak



**Community of Residence:** Chugiak, Alaska

**Comment:** I fish on the Copper River w my dear friends at Ak expeditions. This is their livelihood and if you take it away I will never forgive you. God is watching

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Bob Pawlowski

**Community of Residence:** Anchorage

**Comment:** As a 72 years old disabled vet on fixed income, I depend on my family and our proxy to provide my wife and I with our annual supply of salmon from the Kenai River. My wife and I can no longer access the streams or rivers enough during the year to meet the level of salmon that we have lived with over our 38+ years, especially as dipnetting was a part of catching our annual demand since 2000 on both the Kasilof and Kenai Rivers. The fish from the Kenai River have been essential since 2016. And please recognize it is an essential part of our healthy Alaska diet. Please do not impact us.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. During these inflationary times, having access to freshly caught and family/commercially processed high quality salmon is part of our family's financial stability. It needs to be protected and supported, not opposed.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Carolyn Percy

**Community of Residence:** Anchorage, AK

**Comment:** I fish because I like to eat it. I love the experience and work out it gives me. The relationship I have with the sport of it, and the subsistence need to gather my yearly needs. It's quiet the activity for me wherever I go. I'll travel 6hrs to utilize the chitna fishery and go fishing with Ak expeditions yearly. This will be my 5th time going with them. I reside in anchorage but love exploring alaska. Please don't end this opportunity for me and my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Rodney Pence

**Community of Residence:** Fairbanks, Alaska

**Comment:** I'm retired please Do Not pass these proposals it will RESTRICT or PROHIBIT access and opportunity to secure food in the manner best for many Alaskan families / we dipnet for food.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and



access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Marc Penno

**Community of Residence:** Wasilla, Alaska

**Comment:** My name is Marc Penno. I came to Alaska in August of 2020 to escape the heavy handed restrictions and mandates that covid ushered in. My wife and I wanted to come to Alaska to be more self sufficient and provide a refuge for our family members in the lower 48 should the SHTF. I spent last fishing season learning the ropes on my own. Fish ID, bag limits ,emergency orders ect. I fish the Mat Su Valley area with some excursions out to Kenia and Seward. This coming season I plan to expand my fishing knowledge and become more efficient at being able to provide a sustainable food source for my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.



I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Willie Peoples

**Community of Residence:** Anchorage Ak

**Comment:** It is so hard right now for me as a single father I live paycheck to paycheck and if you take our subsistence away I just don't know how ill be able to feed my family, fishing and hunting is the majority of our food source, with the prices of everything going up seems like everyday, please don't take the subsistence away

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Ron Perry

**Community of Residence:** Achorage

**Comment:** I have been in AK for 58 years, fishing is a part of my families favorite activities, all of my kids fish as well, hindering these resources is a mistake

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



February 26, 2023

Alaska Board of Fisheries  
Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Re: Statewide Meeting

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

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

#### Proposal 153

This proposal comes from the Alaska Wildlife Troopers and says regulatory language will be submitted as an RC during the meeting. PVOA Members are concerned by the lack of transparency and ability to submit public comments prior to the meeting. There are hundreds of thousands of sablefish pots in use between Southeast and the Bering Sea sold by various manufacturers. These pots overlap federal and state fisheries. We believe language needs to be broad enough to include all the gear currently in use and not differentiate between state and federal fisheries.

#### Proposal 154

PVOA members are opposed to the use of drums on seine vessels in Alaska. They are less versatile, slower to set and haul nets, and made for deeper nets than allowed under regulations for salmon fisheries. Many of the 'pocket seiner' sized vessels in Alaska seine fisheries would not be able to safely carry a drum without stability issues. They also reduce the number of crewmen necessary retrieve a net, consolidating participation in seine fisheries. Our organization has consistently opposed similar proposals over the decades.

#### Proposals 157-158

PVOA opposes allowing a person to hold and fish multiple salmon net area permits in a year due to concerns the practice would consolidate fleets across Alaska and undermine current business practices that are frequently a first step for the next generation of fishermen. Holding a salmon net permit while crewing for operations that fish more than one salmon area in a year is frequently a first step for crew moving into purchasing their first boat and additional permits or IFQs.



Thank you for your time and dedication in considering public comments. We are happy to answer any question in by phone or by email at: [pvoa@gci.net](mailto:pvoa@gci.net).

Respectfully,

A handwritten signature in blue ink that reads "Megan O'Neil".

Megan O'Neil  
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 154: Oppose  
Proposal 157: Oppose  
Proposal 158: Oppose

**Submitted by:** Glenn Peterson

**Community of Residence:** Eagle River, AK

**Comment:** I have lived in Alaska for 50 years and I fish primarily from my cabin on the Kenai River. I support a robust science based management program to maintain, improve and protect the fishery. It is with that in mind that I oppose 163-167; the board of fish needs to enhance and insure opportunities for personal use fisheries. As it stands now and for decades Com fish gets the lions share of a resource that should be allocated fairly to all citizens of Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Drew Petrie

**Community of Residence:** Funny River Alaska

**Comment:** I am a born Alaskan who grew up in Anchorage, my family has consistently used the kenai to sport and subsistence fish (dipnet). As dipneting has become more popular over the years it has taken pressure away from the banks of the kenai providing more habitat to be restored. I am now a fishing guide utilizing both the kenai and Kasilof rivers to take people fishing. The reduced pressure that the dipnet fishery crests allows for a better experience for tourist to enjoy along the kenai river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Neil Petrie

**Community of Residence:** Anchorage

**Comment:** Please vote no on proposals 163 - 167. Dip netting on the Kenai is how we have provided fish for our family for over 25 years.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Tommy Pettit

**Community of Residence:** Palmer, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans

opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Abby Pettit

**Community of Residence:** Palmer, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Lila Pettit

**Community of Residence:** Palmer, AK

**Comment:** I fish with AK eXpeditions on the Copper River. As a teenager who is scared of the water, I feel safe with this company.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
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Proposal 158:  
Proposal 159:  
Proposal 160:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Logan Phair

**Community of Residence:** Bellingham Washington

**Comment:** My name is Logan Phair. I fish for subsistence and commercial fish down here in the Puget Sound. Subsistence fisheries should be a priority over commercial fisheries as it's a way of life for Native American communities. I don't live in Alaska but plan on fishing there with my son. It's brought to my attention that this bill will stop subsistence in hopes that the commercial fisheries will get more fish, which is what it sounds like. Local residents deserve the right to a fishery that supports their families and gets food on their table. Subsistence fishing should be the last fishery to ever be negotiated.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Tuayan Phillip

**Community of Residence:** Kongiganak, Alaska

**Comment:** I am a Yup'ik Alaskan Native from Kongiganak, Alaska and I fish on the Copper River to get Sockeye salmon. With these bills passing I won't be able to fish for my family through a charter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Anthony Pittman

**Community of Residence:** Fairbanks, AK

**Comment:** We use this food to feed our family, honor tradition, and most of all connect to the earth. To loose this would be like loosing a piece of our spirit and our connection to our ancestors. This is a direct attack on the citizens of Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Gene Pool

**Community of Residence:** Anchorage, AK

**Comment:** I am a multi-generational Alaskan born and raised in Anchorage. My father was born in Soldotna and we have both been fishing with our families since before we could walk. The fish & game we harvest every year provides our families with healthy cost-effective meals without any added chemicals or other non-natural products added when food is processed in large facilities. We spend most of our time fishing on the family boat in Prince William Sound and the months of July & August at the family cabin along the Kenai River. Without the subsistence dipnet fishery on the Kenai River we would not be able to provide our families with fresh wild Alaska salmon that lasts us through the winter. Not only would we be without wild salmon we would be financially stressed to buy farmed fish that has undergone processing in an unknown facility.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Jonathon Potter

**Community of Residence:** El Paso, TX

**Comment:** As a military member home has always been changing for me every three years or so. However, as a resident of Alaska, I could always count on a state that provided for myself and my family. There is no question that the proposed actions would harm the welfare of the residents in the ways that they maintain their

homes with subsistence and sport fishing. Losing the PWS and Copper River Districts to commercial fishing would have an impact on my family by causing us to change locations further inland to seek food that may or may not be available due to overfishing caused by greedy commercial companies. Why should we allow them to be lazy and impede the native resident's access to natural resources?

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** William Powell



**Community of Residence:** GEORGETOWN TX

**Comment:** We no longer reside in Alaska but we raised a family in Fairbanks from 1982 - 2003. The salmon we were able to dipnet at Chitina became a very important food source for our family. We often dipnetted as a family and were able to expose our children to fishing and respect for nature.

Limiting individual dipnetting is not good for Alaskans and not good for Alaska.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Prince William Sound Setnetter's Association

**Community of Residence:** Homer, AK

**Comment:** Proposal 156-SUPPORT

We support Proposal 156 to prohibit the use of felt soled wading footwear while personal use fishing in fresh water. The precedent was set by the Board in 2010 when similar action was taken in the sport fishery. Please adopt this proposal to be consistent and to prevent the unknown spreading of invasive species in our fresh water systems.

Proposal 159 and 160-OPPOSE

We oppose Proposal 159 and 160. The author of this proposal is directly attacking the commercial fishing fleet and is disregarding the knowledge and experience of ADFG biologists that are already well equipped to make in season management decisions to protect our resources and allow opportunity to all user groups when warranted.

Proposal 163-NEUTRAL

We remain neutral on this proposal as we do not agree with the suggested alternative options. There should be no alternatives enabling the commercialization of the personal use fisheries. We fully support banning the guiding of personal use finfish fisheries, as the commercialization of these fisheries is unethical and irresponsible, inflicting further stress on our finfish resources and monetizing a surplus resource allocated for all Alaskan residents for personal use. Based on the definition of personal use, it seems obvious this is a fishery designed for Alaska residents to benefit from the resource itself, not the potential profits associated.

Proposal 165-SUPPORT

We support Proposal 165 as we agree that profits should not be made off of subsistence resources. The precedent has already been established in specific management areas, and there should be clear statewide regulation prohibiting the commercialization of subsistence finfish harvesting.

Proposal 166-SUPPORT

We support Proposal 166 to establish a statewide bag limit for personal use dip net fisheries. This would still allow Alaska residents participating in the personal use fishery to harvest PU fish from multiple PU dip net fisheries, but their harvest numbers would be cumulative across the fisheries to meet the statewide bag limit. The precedent has already been set in the game management regulations, and the adoption of a statewide PU dipnet fishery bag limit would be a straight forward and sustainable way to regulate this fishery moving forward.

Proposal 167-SUPPORT

We support Proposal 167 to require in season reporting of subsistence and personal use salmon harvest within 5 days of the harvest. This is a realistic time frame for fishermen to provide accurate in season data to the the department, so they have the ability to properly manage the fishery. It is in the best interest of all user groups to provide prompt and accurate in season harvest data to the ADFG area biologists to enable the most proactive and sustainable management practices to be implemented.

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**Proposal 12:**  
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**Proposal 156:** Support  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:** Oppose

Proposal 160: Oppose  
Proposal 161:  
Proposal 162:  
Proposal 163:

Proposal 164:  
Proposal 165: Support  
Proposal 166: Support  
Proposal 167: Support

Proposal 168:  
Proposal 169:



**Submitted by:** Bryan Protzman

**Community of Residence:** Anchorage

**Comment:** My name is Bryan I'm born and raised in Anchorage Alaska, I'm 1/4 Inupiaq Alaska native. My family and I have been personal use fishing in the Kenai river, Kasilof River and Copper river all of my life. Many of the Elder's are not able to access some of the fishing spots without help from charter services as we are not all able to afford our own vehicles to gain access. The potential dangers to disabled and elderly being forced to walk across dangerous terrain or into the water should be considered as highest priority. These proposals would do a serious disservice to many local families who rely on this resource to put food on their plates throughout the winters.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Paisley Protzman

**Community of Residence:** Anchorage, Alaska



**Comment:** I am born and raised Alaskan, part native, and proud of my state and heritage. My fondest memories and what I still look forward to most are harvesting game meat and fish every year with family. Many times I would not have had this experience with grandparents and great-grandparents without the help of some chartered services. Please do not take this option away from local residents who often require this service to fulfill their personal use quotas and put food on the table. Thank you for listening.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 159:  
Proposal 160:  
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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Gerald Protzman

**Community of Residence:** Anchorage, Alaska

**Comment:** As a 74 year old born and raised life long Alaskan I adamantly oppose this restriction on my ability to access some of the personal use fisheries. Declining health and abilities of myself, family and friends as we age requires that we sometimes need this assistance, it's much more affordable to pay a service to help us out once a year than to try and risk serious injury to gain access to our personal use fisheries.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and



access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Robert Ptaszkowski

**Community of Residence:** Wasilla

**Comment:** As a retired disabled individual it is my right as an Alaska resident to take part in our subsistence/ personal fishery. I cant physically stand in these rivers and dipnet with the masses, therefore I hire someone to take me out to gather my fish for the year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** James Pugh

**Community of Residence:** Eagle River, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Ross Purkis

**Community of Residence:** Anchorage, AK

**Comment:** I've been an Alaska resident for 12 years, I chose to stay in the state and raise my child here because of the intact native communities and subsistence lifestyle. We continue to reside seasonally in Delta Junction over the summer while dip-netting in Kenai or at Chitna for subsistence. This allows access to a good education of a modern city and teaching my child the subsistence lifestyle. I cannot accept a board that allows the trawler fleets to drag the ocean destroying fisheries with bycatch and trying to make up the difference by limiting people with an honest claim to the resource by residence.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



# PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

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



PC397  
1 of 2

February 20, 2023

**VIA E-MAIL**

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

**Re: Support Proposal 154 Authorizing Drum Seines**

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

The Purse Seine Vessel Owners Association (“PSVOA”) respectfully submits the following letter in support of Proposal 154 which is scheduled for consideration at the upcoming March 10 -14 Statewide Finfish meeting in Anchorage. PSVOA is a commercial fishing organization that has members who participate in salmon purse seine and other commercial fisheries throughout Alaska.

Proposal 154 seeks to repeal 5 AAC 39.155 which makes the use of a drum or reel around which a seine net can be coiled or rolled unlawful. As mentioned in the proposal, the ban on drum seines was adopted in the late 1950s in response to a number of seiners who configured their vessels with a drum seine. The advantage of drum seines over power blocks at the time the regulation was adopted was a drum seiner could operate more efficiently than a seiner with a power block in terms of the time required to retrieve the net.

Since 1959, the technology for purse seine power blocks has improved dramatically. Vessels equipped with a power block are able to make the same number of sets per day as a drum seiner. Accordingly, the rationale for adopting the ban on drum seines, specifically, the need to level the playing field between vessels with drums seines and vessels without, is no longer valid. Moreover, heavy purse seine blocks present a danger to the crew working on deck below the block which is affixed to a boom above the back deck. In addition to the risk of a heavy power block falling on a crew member, the crew is also at risk of being hit with a falling metal purse ring or a heavy lead line as they move through the block.



In sum, drum seiners no longer have an advantage over seiners that use power blocks in terms of efficiency and present fewer risks of injury to crew than power blocks. Thank you for your consideration of PSVOA's comments regarding Proposal 154.

Very truly yours,

*/s/ Robert Kehoe*

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

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Proposal 154: Support

**Submitted by:** Roberta Quintavell

**Community of Residence:** Anchorage, Alaska

**Comment:** I'm a lifelong Alaska Native fisherman who has subsistence fished and depend on the Kenai River personal use fishery to sustain my winter fish diet. I use this opportunity to share subsistence values with my children and their children. Together we smoke and can our catch to share with extended family and friends throughout the rest of the year. This is a wonderful way of passing down not only the knowledge but the values associated with caring for our family and community.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** William Rainer

**Community of Residence:** Eagle River, AK

**Comment:** Been resident for 33 years now and carrying on and passing down how to respect and follow the rules for sport and subsitant fish and hunting to my children and grandchildren! Please do NOT pass these proposals. The attack on our rights as citizens of the State is just wrong!!! We do not over harvest and definitely do not have adverse by-catch affecting the population .

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Elaine Rainey

**Community of Residence:** Kenai

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 156:	Proposal 163: Oppose
Proposal 13:	Proposal 157:	Proposal 164: Oppose
Proposal 82:	Proposal 158:	Proposal 165: Oppose
Proposal 87:	Proposal 159:	Proposal 166: Oppose
Proposal 153:	Proposal 160:	Proposal 167: Oppose
Proposal 154:	Proposal 161:	Proposal 168:

**Submitted by:** Rikk Rambo

**Community of Residence:** Eagle River, Alaska

**Comment:** I fish on both saltwater (out of Whittier, Seward, and Homer) with fellow military and law enforcement veterans, as well as current members of the U.S. Armed Forces and State, Federal, and Local law enforcement communities. We fish for a multitude of reasons...for the comradery, therapeutic value, and of course for subsistence and to offset Alaska's high grocery prices. Primarily, we fish to get out into nature and live our better lives.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Primo Ramirez

**Community of Residence:** FAIRBANKS

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans



opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Brent Ramsay

**Community of Residence:** Anchorage, AK

**Comment:** I am writing in opposition to Proposal 163 on the points of equal access and public safety. Most people, like myself, are unable to afford a boat. Using a guide allows me equal access to the personal use resources that a boat owner has access to. It also ensures that my ride down the river is provided by an outfit that is experienced in safely navigating the river also while ensuring passenger safety while on the swift water. In the interest of equal access to our wild foods and public safety on our waterways, please vote no on this proposal.

I am writing in opposition to Proposal 165 on the point that the cost of operating a boat is far greater than fuel, and ice, etc., and include boat purchase, maintenance, etc., and thus this proposal would effectively end guiding on personal use fisheries. Guiding in personal use fisheries is important as most people, like myself, are unable to afford a boat. Using a guide allows me equal access to the personal use resources that a boat owner has access to. It also ensures that my ride down the river is provided by an outfit that is experienced in safely navigating the river also while ensuring passenger safety while on the swift water. In the interest of equal access to our wild foods and public safety on our waterways, please vote no on this proposal.

I am writing in opposition to Proposal 166 on the point that different bag limits for different fisheries acknowledges the different independent management strategies for each fishery which account for unique escapement goals and other in-season factors. Like sport fishing and commercial fishing, different fisheries

have different bag limits and quotas for this reason. Comparing fisheries management to hunting rules and the management of big game species is like comparing apples to oranges.

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<b>Proposal 12:</b>	<b>Proposal 157:</b> Oppose	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b> Oppose	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b> Support	<b>Proposal 167:</b> Support With Amendments
<b>Proposal 87:</b>	<b>Proposal 160:</b> Support	<b>Proposal 168:</b> Support
<b>Proposal 153:</b>	<b>Proposal 161:</b> Support	<b>Proposal 169:</b> Support
<b>Proposal 154:</b>	<b>Proposal 162:</b> Support	
<b>Proposal 155:</b> Support	<b>Proposal 163:</b> Oppose	



**Submitted by:** Titus Rand

**Community of Residence:** Eagle River, AK

**Comment:** Do NOT close dipnetting to commercial charter salmon fishing on the Copper River. I fish w Ryan Ford and he is an exceptionally safe charter and his business supports my families needs for food, a fellow Alaskans livelihood, and my ability to participate in subsistence fishing for the year. This also supports safe access to the river and minimizes over crowding on the river.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Donald Rathbun

**Community of Residence:** Eagle River

**Comment:** I fish for pleasure and for food for my family. I believe all fishing has a place and dipnetters give those with little time to be ability to stock their fridge for the season.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Steve Ray

**Community of Residence:** Eagle River AK

**Comment:** I've been dipnetting on the Copper River for 40 years and plan to dip another 25 God willing. Over the years my family and I have depended on the fish we catch in the personnel use fishery for a substantial part of our diet.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Tom Reale



**Community of Residence:** Anchorage

**Comment:** I vehemently oppose any rule or regulation that will restrict my access to or limits of Alaska residents dipnetting rights. Please keep us in mind when formulating or agreeing to any such proposals. Thanks you.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 12:**  
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**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Matthew Reichart

**Community of Residence:** Fairbanks

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

How do these proposals benefit the average Alaskan? How much do these proposals benefit a much lower number of commercial fishermen in comparison? How many commercial fishermen actually reside in Alaska year round and do they even pay taxes that benefit our fisheries? Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 82:**  
**Proposal 87:**  
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**Proposal 154:**  
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**Proposal 156:**  
**Proposal 157:**  
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**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Robert Reinhart

**Community of Residence:** Homer, Ak

**Comment:** I am a born and raised Alaskan and I have lived in Homer most of my life. I sport fish Kachemak bay and participate in the local subsistence fisheries. The commercialization of the Kenai River dipnetting by guides e.g. Dipships, is getting way out of control. In my opinion, This was never intended to be a guided industry.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Aaron Rhoades

**Community of Residence:** North Pole

**Comment:** My name is Aaron Rhoades and I fish the Chitna below the bridge. I go with Rockskip Charters. I go with them and bring my kids. We eat red salmon all winter when we go. I use a charter because I don't have a boat.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 11:	Proposal 82:	Proposal 154:
Proposal 12:	Proposal 87:	Proposal 155:
Proposal 13:	Proposal 153:	Proposal 156:



Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Duane Richards

**Community of Residence:** Wasilla

**Comment:** I and my family participate in hunting and fishing for subsistence . We do not wish to be burdened by any new or restrictive policies that may be put in place !!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:  
Proposal 153:  
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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Walter Richards

**Community of Residence:** Chugiak

**Comment:** I live in Alaska I use charters to fish the Cooper and the Kenia rivers. I do this because I can not afford my own boat and I feel it is unsafe to fish the river which I am Unfamiliar with. The Cooper is not safe to "tie" yourself into to fish. I rely on fishing and hunting to feed my family of five!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Ken Risse

**Community of Residence:** Fairbanks

**Comment:** The only fishing I've done for the last 25 years was my annual trip to Chitina. I usually go alone and fish from the trail below O'Brien Creek. As I am getting older (65 now) I have been using a charter operator to ferry me to my fishing spot.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.



I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Monte Roberts

**Community of Residence:** Soldotna

**Comment:** I am a guide on the Kenai,

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Thomas Rogers

**Community of Residence:** Palmer

**Comment:** I grew up in North Pole and have fed our family through dip netting the Copper River for salmon since the early 1980's. My family now lives in South Central and we depend on the Copper River for our protein

source because of inflation and the fact that wages working for the state of Alaska are far below sustaining a family from the grocery stores. If we can't fill our freezer with Copper River fish we depend on the dip net fisheries of Kasilof or Kenai rivers. We don't take more than we will use in a year. I've never had any wanted due to freezer burn or over harvesting. Commercial fisheries have ruined all the runs I grew up fishing and they blame the tiny percent of sport fishermen and dip netters when they are the ones that destroyed the once string runs on the Kenai, Talkeetna, and many Matsu rivers.

I STRONGLY OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jeffrey Rogers

**Community of Residence:** Anchorage, ak

**Comment:** I'm a 30 year Alaskan resident and currently AK Army Guard soldier, I dipnet the Chitna with use of water taxi, taking away that ability, greatly hinders my ability to provide for my family. With my military duties and small child, I have limited ability and time to get my fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.



Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Chris Rounds



**Community of Residence:** Anchorage AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Robert Rouse

**Community of Residence:** Anchorage

**Comment:** As a veteran, I'm all about helping people. Many Alaskans rely on dipnetting to supply them with food for the year. Alaskans with mobility issues, both young and old, will be left out if they are not allowed to hire boats to help them secure their fishing rights and food supply.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Justin Rump

**Community of Residence:** King Salmon, AK

**Comment:** My name is Justin Crump and I am a fishing lodge owner in King Salmon, Alaska and have participated in the Bristol Bay fishery since the year 2000.

My comments are all directed towards the Nushagak king salmon stock of concern and proposals that were not discussed in the December meeting.

Proposal 11:

I oppose any changes to sport fishing bag limit reductions. The commercial harvest of king salmon during the sockeye fishery is roughly 10x that of the sport fishery, and a reduction of 3 king salmon over 28" per angler, will save roughly 6,000 "spawning size" king salmon. ADFG states that the Portage Creek sonar station is only 35-65% accurate for king salmon counting, so reducing sport kept adult king salmon by 6,000 is much less than the sonar is off every season.

(1) the bag and possession limit for king salmon 20 inches or greater in length is two fish, of which only one fish may be 28 inches or greater in length; the annual limit for king salmon 20 inches or greater in length is four fish, of which only one fish may be 28 inches or greater in length; the bag and possession limit for king salmon less than 20 inches in length (jack salmon) is five fish; ...

Proposal 13:

Proposal 13 to me will have the biggest positive effect on king salmon management and abundance. Forcing the sockeye fleet into a Wood River fishery until July 1 will put more king salmon into the Nushagak river on years with optimal weather and water conditions. Some years though, the water and weather is not optimal, and king salmon will stay in Nushagak Bay, 'milling' up and down on the tide. This will be more and more likely as the summers in SW AK are increasingly warmer and more mild, so the chance for fish to mill is higher and higher.

By requiring scheduled closures during the season, managers will be able to adapt their management based on weather and water conditions. This will allow for a much more diverse and resilient population of king salmon to escape, rather than giving the early returning fish a pass, and eliminating the post July 1st fish from the ecosystem.

The other consideration that proposal 13 will allow for is drop-out and net marked king salmon. When the commercial fleet is operating during the peak sockeye migration, and fishing nearly all of each tide, the king salmon that do escape into the river have a very high mark rate. I would speculate that 90% of the king salmon that enter the Nushagak during this time are net marked. What is the spawning success of heavily net marked fish?

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Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:

**Submitted by:** Jim Sackett

**Community of Residence:** Fairbanks

**Comment:** I fish and dipnet to feed my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Craig Sandine

**Community of Residence:** Fairbanks

**Comment:** Definitely oppose closing or altering rights of sportsmen and sustainable personal use fishing rights.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Sarah Sandstrom

**Community of Residence:** Palmer, Alaska

**Comment:** My name is Sarah Sandstrom. I am a divorced mother of 5 children who has lived almost 37 years in Alaska. Subsistence fishing is important to our family and tens of thousands of others in this abundant state.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Joey Santiago

**Community of Residence:** Wasilla

**Comment:** AK Resident since 2011; I routinely use these resources, at times with charter services due to lack of access to equipment required. I fish to provide a good natural food source for my family, and routinely use AK expeditions charter service to provide a ways and means to acquire fish from the Copper River.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Bart Saunders

**Community of Residence:** Palmer, Alaska

**Comment:** I fish to feed my family and to help out those in need who cannot fish for themselves. With my sons, other family & church members, and disabled veterans, we fish the Copper River, Klutina River, Russian River, Kenai River, Kasilof River, and Resurrection Bay in order to provide for our families.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and



access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Please do not enact, in any way, shape, or form, any of these proposals.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Mike Schierman

**Community of Residence:** Wasilla, Alaska

**Comment:** I and my wife are 33 year residents of the state with 3 grown boys and their families who count on dipnetting at the Kenai for Reds for the coming year

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Brett Schimmack

**Community of Residence:** Eagle River, AK

**Comment:** I have fished commercially and and recreationally for a decade and a half and am a lifelong Alaskan. I wholeheartedly support proposals 163, 164, 165, 166, and 167 to maintain the intent of a subsistence fishery, and limit commercial operators taking advantage of Alaska's incredibly valuable natural resources.

I SUPPORT Proposals 163-167. Alaska struggles with food insecurity and allow commercial operators to profit off the of needs of Alaskans in immoral and truly awful.

I strongly support Proposals 163-167 and ask the Board of Fisheries to VOTE YES on each of them.

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Proposal 11:	Proposal 156:	Proposal 164: Support
Proposal 12:	Proposal 157:	Proposal 165: Support
Proposal 13:	Proposal 158:	Proposal 166: Support
Proposal 82:	Proposal 159:	Proposal 167: Support
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Support	



**Submitted by:** Franz Schonberg

**Community of Residence:** Petersburg, alaska

**Comment:** Hello,

I have been a lifelong commercial fisherman whose family has depended on commercial fishing to support itself for generations. I would like to give my support for proposal 12 as it will be effective in reducing commercial fleet interception of Nushagak chinook.

I started fishing in the Nushagak with my Dad in 2008 when I was 13. Back then we would fish 5 1/8" mesh size targeting sockeye, and we would average give or take 500 pounds of king salmon fishing from the start of the commercial sockeye opener until July 6th or right around there. Those were during years when king

salmon were in abundance, The biggest fish we caught was a 69 pounder in 2009. That fish was an anomaly as we most of the time we would catch under 10 pounders, but it was exciting.

Since then the sockeye sizes has shrunk with these large runs and we've adapted to smaller mesh sizes for optimization of sockeye harvest. I have owned my own Bristol Bay fishing operation since 2018 and fished the Nushagak for the beginning of the season and there is a minimal amount of chinook interception during my tenure. I have been fishing 4 3/4" gear and in the rare situation we catch a king salmon it is a jack.

My point to this commentary is to explain how mesh size makes a big difference in what commercial harvest intercepts.

The Department is working on improving its enumeration process to get a more complete count of king salmon, this may take some time to implement but I have faith they will do a good job. There are many members of Alaskan fishing communities around the entire state who depend on Bristol Bay sockeye salmon income to make it through the rest of the year. Many of us partake in multiple fisheries to balance the risk of a crash in price or ability to harvest. We are currently experiencing an economic route in many commercial fishery prices due to global economic recessions combined with a strong dollar. It is hard to make a living off of commercial fishing during these years and Bristol Bay is one of the few places around the state that has been a buoy of economic lifeline for many around the state.

All I ask is that the Board think heavily about the economic impact they will have on communities around the state with any decision that will severely limit our ability to make a living in Bristol Bay.

Thank you for your time,

With respect,

Franz Schonberg

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Proposal 11: Oppose  
Proposal 12: Support  
Proposal 13: Oppose  
Proposal 82:  
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Proposal 153:  
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**Submitted by:** Ricky Schweim

**Community of Residence:** Wasilla, AK

**Comment:** I fish with a guide on the Cooper river below the bridge. My family and I subsist on salmon for the entire year along with big game. Losing this privilege would be detrimental to our existence in Alaska, the state we chose to live and die in because of the freedom possessed.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Samuel Schwendner

**Community of Residence:** North pole

**Comment:** I have dinette in both areas, Kenai and Chitina. I love the opportunity to dipnet. I have taught my kids to dipnet and hope to teach my grandkids to dinner.

I think the commercial fishing folks need to stay away from personal fishing anything. They have screwed up the halibut fishing with their idea of great limits and letting the IHCC get to increase their catch. I need to feed my family and enjoy the time with them catching fish. Not just talk about it when it has been taken away.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.



Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



February 16, 2023

Board of Fish

I am sending this letter to you as a spokesperson for over 6 families and property owners on the Kenai River between River Mile (RM) 41 and RM 42. These properties alone have a combined retail value of 2 to 3 million dollars. We all have a vested interest in the Kenai River and what happens to it. I have previously made communications with a number of State Agencies, Alaska Fish and Game; Department of Natural Resources; Army Corp. of Engineers; Alaska State Troopers with special attention to Wildlife Officers; Alaska State Parks; Kenai Peninsula Borough; and Glenn Haight, Former Executive Director, Alaska Board of Fisheries. I have also communicated, mostly one-way, with Current and prior Governors, Current and prior Heads of Department of Natural Resources, Troopers, Alaska Fish and Game, State Parks. I have also communicated mostly again one-way with Current and prior Senators and Representatives from the Kenai Peninsula, and those that represent me in Anchorage. Out of all of these letters, I only received replies back from two people Mr. Haight, and now former Senator Micciche. Not a note or any reply from any of the so call head officials or their underlings. The lack of communications from the different agencies is evident to all of us property owners that ALL of the State officials DO NOT care about the State preservation for its resources both land and fish, along with other animals and habitat. Yes they say they do, but if you think about it, all one has to remember is that they are politicians, and I remember a wise man once saying "How can you tell if a politician is lying --- his lips are moving." Over the past decade this statement has been very true.

Let me introduce myself. My name is Scott O. Sell, I arrived in Alaska in 1969. I got married here, we have three children two of them live in Juneau. I have lived full time in Anchorage, had a couple of businesses and retire from the Federal Government. I purchased my Kenai River front property in 1979. I have fought for property owner's rights, and boaters rights. I fought against the politicians and former head of the Kenai River Sport Fishing Association (a good financial friend of a lot of Politicians) who



were pushing to make the Kenai River a State Park. Most of us who owned property prior to the Kenai River becoming a State Park, knew that this was a bad idea and it still is. In fact it is worse now than when it started.

The Kenai River had its problems, the local paper at the time reported it. There are similar problems, boat accidents, guides abusing the river, today just like happened back in the 70's and 80's. It is just pure luck that we have not had a major incident or death yet. So really nothing has changed in 40 years except the State has put fees, regulations, tried to control and take property owners rights away, bought property and built structures. So back about 40 years ago, the rivers problems were mainly below the Soldotna Kenai River Bridge to the mouth of the river. So the state in its infinite wisdom, did not enforce laws on the books, increase the patrol (if any at that time) of F&G or Wildlife Troopers. They decided to make the river into a Park and NOT correct of try to fix a small areas (a 22 river mile) problem but NO they knew best and figured making a Park (100 River Miles long and remember property is on both sides of the river making it 200 River Miles) was best to re-invent the wheel.

Since the state took over, the only thing that has gotten better is the State Parks property. The condition of the river has gotten worse, loss of river banks, habitat, and fry fish. We have the different agencies having so-called biologist to figure out and correct such problems. However, when we have more than one agency in charge or trying to be in control then what we really have is "CHAOS".

If there is ever any control and any idea of closing fishing to the public we then would have an uproar from the Businesses in Soldotna, Kenai and surrounding areas (most not tied directly to fishing), Guides (yelling loss of business and lively hood). Let's take a look at the guides: Guiding is a seasonal business on the Kenai River. The ones I see on our section of river between Bing's Landing and Skilak Lake, usually have four (4) clients in their boat. (In past years most guides followed most of the regulations). Guides DON'T own property where they fish, the bank at RM 42, the bank at RM 43, the bank at RM45, and the bank at RM 46. None of these would be a problem if the guides motored up the river and anchored their boat in the water and their clients fished from the boat. However, this is not what



happens. What happens is the guide motors up the river (to their favorite spot) anchors on bank and all their clients get out and fish from the bank. It could be unknown private property, state property, or even federal property that they are using. It is also unknown if they pay a fee to the owner of the property for the privilege, but in my own opinion I would say NO THEY DON'T pay to use the areas.

All of the guides on the Kenai River and all rivers in Alaska, (as I found out at the Anchorage Fish and Games building, fishing section) need a guide sticker for their boat so the public can identify a guide boat. These sticker are a yearly sticker and they must be current each year. I was shocked when I asked F&G my next question, which was how much do the guide have to pay each year for the stickers? The answer was the guides DO NOT have to pay for the stickers they get them FREE.

So not only are the guides (in my opinion) one of the most serious destroyers to the Kenai River, (and most likely other rivers) with their large boats, creating large wakes, intentionally motoring close to property banks where they do more damage, then if they motored up/down the CENTER of the river. Most if not all of the people I am speaking for in this letter have lost minimum of 5 feet and some over 10 feet of property. The guides, their boats, and their client's damage banks when they stop at the guides favorite spot – get out of the boat and tramp up and down the bank destroying someone's property other than their own. Generally speaking, the public thinks the guides are doing things correctly, BUT the fishing community's grapevine has stories and photos along with videos (at the time of writing this I cannot confirm or deny them). Stories like guides receiving citations about using an illegal "chip" for more engine power. I personally belief the stories of the chip, only because having a view of the river all day long while I am at my cabin and have questioned my neighbors after watching 2 boats going up the river of equal size, equal number of people, same type of engine and size engine BUT one boat is able to overtake and continuing putting distance between them? If all were equal then they should not be able to pass until the boat in the lead slow or stopped.

As you can tell, I am NOT a fan of the guides. I am also NOT a fan of the enforcement people who are not doing their job. I also am NOT a fan of





the head people who talk out of both sides of their mouths. Some people call these people liars or have other terms for them.

I would propose that the Board does not approve any of the proposed Proposals # 162, # 163, # 164, # 165. We DO NOT need to allow the guides an easier way for them to operate, when they are part of the problem. What we need is stronger regulations and stronger enforcement. If the State cannot provide it then the Kenai River, needs to be a 100% DRIFT ONLY RIVER to insure the mature fish, the baby fry, the habitat, and private property won't be lost.

I would propose full enforcement people on the river, State Parks, Fish & Game, and Wildlife Troopers.

I would propose putting up signs at areas like Bing's Landing stating hour that the area is open. I would suggest 6 a.m. to 10 p.m. (Most city, community's that have parks have hours of operation) and Bing's Landing where the boat ramp is does not have overnight camping. Once this has been done then have a lock on the boat ramp gate until stated hour. Your own regulations in 2022, page 12, "Sport Fish Guide Regulations" state "Sport fishing is only allowed Tuesday-Saturday 6 a.m. to 6 p.m. then at 6 a.m. the gate at the boat ramp can be opened by the Park Ranger. This would also be a good time to ensure that the boat, guide, and clients all have license, tags, sticker, etc. Then also if the "Ranger" was properly trained on engines he could pull cowling and check to see if correct chip is there.

This would also NOT allow the guides to motor up the river at 3-4 a.m. and I know they do because I have called and reported them, however, the calls fall on deaf ears of the enforcers who do not want to deal with it. Most of these morning not just one guide is going up the river it is generally seven (7) to ten (10) or more guides. I have even gotten up and looked out my window and cannot see across the river because of fog. The safety of the clients in these boats is upon the guide and that is why I stated that a major accident is going to happen. We thought that the accident was going to happen last summer. Four or five of us were talking around the fire pit enjoying the day and we saw four or five kayakers, two paddle boarders, and three inflatable canoes drifting down the river also enjoying the day. When we saw two guide boats racing each other coming down the river.



They did not slow down and were taking up the majority of the river. They were heading straight for the floaters and the floaters had to work fast and hard to try and get closer to the bank to avoid getting ran into by the guide boats and at the very last minute the two guide boats swerved to avoid an accident. The guide boats never slowed and kept right on going to Bing's Landing to off load their current clients and return with new clients about 20 minutes later. I and all of my neighbors would be witnesses for the injured clients stating continues and what we have seen in the past and the lack of enforcement so that a major law suit could not only affect the guides but the State of Alaska.

I would propose to remove the dates (except the time period you are allowed to catch the fish) from these page, because they should be enforced every day of the year and not just certain months.

I propose that the guide stickers have a per year price tag on them and I would suggest \$ 1,000.00. Broken down as follows \$ 100.00 to state agency, \$900.00 going into a special fund so destroyed property can be repaired by property owners. As it is now the guides have no investment if they get the sticker for free. Also if they break the rules and/or regulation their sticker get pulled for the remainder of the season or year.

I propose that we reduce the number of guide on the Kenai River. I further propose that one guide license is good for **only** one boat and the registered guide. We have too many guides, asst. guides who could care less about the river, the fry fish, the mature fish, and the habitat because they out for the all mighty dollar. Some do not life here and others are seasonal worker. Remember ANY damage to the Kenai River banks, habitat will mean the loss of fishing down the road, case in point Kenai River Kings.

I would also propose that if the Board of Fish and the State of Alaska can't or won't help correct problems and issues on the Kenai River then the Board and the State need to make the WHOLE Kenai River into a DRIFT ONLY river.

In conclusion if the State of Alaska, and the Board of Fish do not act then we will not have a Kenai River fisheries. This is a good case of the "Broken Window" theory. Which for you that do not know about it, take a large building or warehouse and people see it and some throw rocks at the



windows for fun. Then other do the same and more windows are broken. If the enforcing agencies don't do their job and stop people and arrest them soon the building or warehouse is in ruin and has to be torn down for if nothing else but safety of the community. If no one does their job then the Kenai River could and most likely will fall due to erosion, habitat, pollution etc.

If any of the Board has doubts I and my river neighbors would like for you to come down and look for yourselves in July, August, and September. We have made the same offer to the enforcement agencies to look for themselves or to look at videos that have been taken over the years, but they are always too busy. Crime must be running rampant for them to be so busy.

Thank You

Scott O. Sell

[sosell@alaskalife.net](mailto:sosell@alaskalife.net)

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 162: Oppose

Proposal 163: Oppose

Proposal 164: Oppose

Proposal 165: Oppose

**Submitted by:** Roger Senatore

**Community of Residence:** Delta Junction

**Comment:** I am a 100% disabled combat veteran and long time participant in the Copper River personal use fishery. Though I have many seasons of climbing up and down the steep and often dangerous western bank of the Copper, at the age of 59, I know my days of doing so are numbered. Without the option of fishing with an experienced charter captain, my choices are limited. Though I am an experienced riverboat operator, my equipment is not well suited as a dip netting platform and therefore not a good or safe option. That leaves trusting my life to a boat operator with unproven capabilities or to a charter captain with known expertise. Therefore;

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**



February 25, 2023

Alaska Board of Fisheries  
Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

RE: Support of Proposals 157 and 158  
Deadline for comments extended to February 26

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

My name is Mark Severson and I support Proposals 157 and 158 which would allow a person holding CFEC permits for multiple salmon net areas to commercial fish for salmon in more than one net area per year, as follows:

I would like the board to consider allowing permit holders of different salmon net gear cards to be allowed to fish them on different boats of different gear groups (i.e. Southeast seine, Bristol Bay gillnet) in the same calendar year.

I agree that the permit holder MUST fish the net gear permit on/off separate registered fishing vessels meaning two different fishing vessels and document you intend to fish both salmon net gear cards with CFEC and which designated vessel you plan to fish different gear permits on/off of.

Our son, Cameron Severson owns a Bristol Bay boat and gillnet permit. After that fishery he relieves me as skipper on our fishing vessel Odin in the Southeast salmon seine fishery. I skipper the early seine season to keep our young crew employed. Allowing him to own two salmon net gear cards would simplify our operation and transition from Bristol Bay to Southeast salmon.

There are many fishermen in Southeast and across the state who own operations in Bristol Bay and finish off their seasons in another salmon area on different boats. I have heard the argument that the current rule protects the stocks but I believe it is the opposite putting less pressure on the stocks.

Currently in Southeast Alaska you are able to own and operate different salmon gear cards off the same fishing platform in the same calendar year. I.E. Troll, Gillnet and Seine off the same fishing vessel in the salmon calendar year owner by the same permit holders.

Please consider a change in the current regulation by supporting Proposals 157 and 158.

Sincerely,

Mark Severson

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 157: Support  
Proposal 158: Support



**Submitted by:** Lucas Seymour

**Community of Residence:** Anchorage, AK

**Comment:** My name is Lucas Seymour. I'm a 26 year old life long Alaskan. Ever since I was a kid I remember going on fishing trips with my family all over the state. Some of my best and most fond memories are from fishing trips with my family. Most of our fishing trips are down to the Kenai Peninsula. My family and I fish out of Homer and on the Kenai and Kasilof Rivers mainly. We fish for trout, salmon, halibut, rockfish, ling cod, and anything else we can catch while out on the water. The reason I fish is because it is my passion, It allows me to get outside and enjoy this beautiful state we live in with people I care for, and I rely on it to provide food for myself and my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. There are a lot of commercial fishermen who come from out of state, and the fact that they are trying to restrict the people's ability to harvest salmon that live in this state is absurd and wrong. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. Every year since I was a child I can remember my family and I going down to the Kenai River to harvest our yearly limit of salmon. We have never missed a year of dipnetting. I have so many amazing memories from these trips, and these fish have fed my family for decades. We rely on these fish to be a part of our diet. I know that my family and I aren't the only ones that rely and love this fishery, and love being able to get their yearly amount of salmon easily. Food costs are on the rise, and limiting the residents of Alaska ability to harvest food for themselves would hurt so many residents. Not only that, but people would miss out on the opportunity to make lifelong memories.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Please stand up for Alaskan residents. Don't restrict our ability to harvest our natural resources that a lot of us rely on throughout the year. These proposals are wrong, and aren't in the best interest for Alaskan residents.

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**Proposal 12:**  
**Proposal 13:**

**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**

**Proposal 154:**  
**Proposal 155:**  
**Proposal 156:**

Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Leslie Sharpe

**Community of Residence:** Big Lake

**Comment:** We go to the Kenai, Nikiski, Kasilof each year for set net, dip net and sport fishing ea h summer. This helps feed our families, friends during the year as we both smoke and freeze our fish. We depend on this for food for our families!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Matt Shaughnessy

**Community of Residence:** Palmer, AK

**Comment:** It would be a devastating and horrific day if you actually side with big commercial fish companies to regulate/ban is residents from providing sustenance for ourselves.. evil plain evil!

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Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Jodell Shepard

**Community of Residence:** Wasilla

**Comment:** I am a disabled female that takes my children to the Kenai or Kasilof Rivers for subsistence fishing, we rely on these fish that we catch throughout the winter for food. This salmon feed a family of eight, and 4 elders that live next to us. Without the ability to do subsistence fishing for my family, I will be forced to rely on other state programs to Feed my family. I would love to see restricted days on the commercial fisherman who are I understand trying to make a living, but I'm trying to feed the living. I think there should be some restrictions on commercials that allow people of the state of Alaska to obtain food for their families over profit.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Arthur Shepherd

**Community of Residence:** Anchorage, AK



**Comment:** My wife and I have been fishing in Alaska for a lifetime. She is a Native Alaskan who grew up in Lime Village, AK. We dipnet in Kasilof, and in recent years have not attempted to maximize our catch. It has always been a dream to go to the Copper River and get a few fish there some year. Commercial fishing supports a small portion of Alaskans, and I would urge you to allow all Alaskans to utilize the States resources without onerous restrictions emanated from those with selfish interests. I oppose proposals 165, 166, and 167.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Annette Sheppard

**Community of Residence:** ANCHORAGE

**Comment:** There are plenty of fish for both commercial and residential subsistence purposes. This is an activity Alaskan families do as family events, and they share with others in their harvest. Trading fish, meats, sharing and gifting is just part of how Alaskans live. You shouldn't have to be a commercial fisherman to do this. This is a quality of life for Alaskans. It's part of being the community.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:

Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose



**Submitted by:** Dayle Sherba

**Community of Residence:** Anchorage, AK

**Comment:** My husband and I, and friends, have been dipnetting at the lower end of the Kenai River every year since it first opened up. When it first opened, our infant daughter was in a backpack, and we using a landing net. I'll never forget harvesting around 25 fish in a couple hours - we had hit the run just right! Over the years, we moved further downstream, our daughter played along the beach, and we switched to a real dipnet. The lower end of the river is such a safe place to fish for fishermen and children. Heck, if Sarah had fallen in the river, there would have been bunches of people with nets to scoop her out. It is such a beautiful place to just stand and appreciate the scenery, especially on a sunny day, and still amazing even on rainy, cold days. We watched bears on the opposite bank, seals in the river, fishing jumping out of the water, and felt fish bump our legs as they escaped our net. The fish we catch is lovingly cleaned and frozen. It is a wonderfully healthy food that we enjoy eating throughout the year until we are able to dipnet the following year. An Alaskan doesn't need to be wealthy to preserve a year's supply of this wholesome food. However, if subsistence fishing is significantly restricted, then an Alaskan would need to be wealthy in order to buy that same year's supply of fish from commercial providers. The fish that return to Alaska's streams belong to ALL Alaskans, and should be enjoyed by Alaskans first. It's not ok to further reduce the subsistence allotment, or to set this resource aside only for commercial providers for purposes of shipping Alaskan fish outside of Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Edward Sheridan

**Community of Residence:** Soldotna, Alaska

**Comment:** I've been sports fishing the Kenai and Kasilof rivers for salmon and Cook Inlet for Halibut. I've witnessed size and daily bag limits be reduced for the last 25 years. All the while bottom trawlers have decimated the King salmon and Halibut fisheries with wanton waste of these species through ineffective bycatch monitoring. Now commercial fishermen want to impose restrictions to our subsistence fisheries in Cook Inlet tributaries. It's time to protect the Sports Fishing industry as well as protecting these resources for future generations. No one will ever catch another trophy Chinook because of trawlers bycatch.

Sports fishing is as much an industry as commercial fishing and requires more protections for personal use and subsistence fisheries

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans' opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition to participate in the harvest and I take pride in my ability to be a provider.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Jonathan Shurtz

**Community of Residence:** Chitina

**Comment:** Proposal 163 prohibiting "guiding" in personal use fin fish fisheries: **STRONGLY OPPOSE**

Mr. McCormick states that the industry of guiding in personal use fisheries is growing rapidly, which is not the case. Speaking on behalf the Copper River there are the same charters that have been running for years, with the newest established in 2018. These operators are not in the business of selling fish ex vessel, and the comparisons made are not applicable at all as the Commercial sector in Cordova operates on an entirely different business model. This proposal compares the personal use operators to the "commercial fishermen", which isn't fair or true. The harvest in the personal use is a fraction of the take of the commercial operators out of Cordova. Personal use operators are selling an opportunity for the clients to safely fish aboard USCG licensed captains vessels on the river, to catch the fish they are allotted by the state. The Copper River is not a good place for inexperienced boaters, and eliminating professionals on the river is a huge public safety concern. The businesses operating in the personal use fishery are selling safe access for Alaskan residents to participate in the fishery under the guidelines set forth by the Alaska Department of Fish and Game, and are not paid by the pound but rather by the participant. This proposal is not based on science, is not aimed to benefit the run as a whole, and is purely based on entitlements of a public resource.

**Proposal 164 registration and reporting requirements: STRONGLY OPPOSE**

This proposal is redundant. ADFG already collects in-season data from the sonar, and has an established permit reporting system for all participants in the fishery. The customers of charter operators in the personal use fishery all fill out their harvest records prior to leaving the fishing grounds. The data sent in to ADFG from the clients of the charters is highly accurate, and it is in the best interest of the charters to operate under the full letter of the law. Repeating the same fish harvest report to ADFG is not only useless but would cost the department to process the redundant data.

**Proposal 165 prohibit compensation for subsistence guiding: STRONGLY OPPOSE**

Subsistence access should not be limited, but rather encouraged. Recently, many people from the AYK drainage have travelled to new areas, being that their state and federal subsistence opportunities have been limited. Access to these new areas is limited to local knowledge, and further reducing access for these people is NOT the answer, particularly when there's no biological reason for such.

**Proposal 166- Establishing a statewide limit for personal use fin fish: OPPOSE**

While this would encourage people to use every possible bit of the fish they harvest it would be massively confusing for people and an enforcement nightmare.

**Proposal 167- Requiring reporting of personal use caught fish within 5 days: STRONGLY OPPOSE**

Another redundant proposal. There are already methods that provide real time data giving ADFG the information needed to use their EO authority to close fisheries when the security of the resource demands it. ADFG has stated that this is repetitive and would only serve to cost the department money and resources spent on data collection they do not need.

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**Proposal 11:**

**Proposal 12:**

**Proposal 13:**

**Proposal 82:** Support

**Proposal 87:** Support

**Proposal 153:** Support

**Proposal 154:** Oppose

**Proposal 155:** Support

**Proposal 156:** Support

**Proposal 157:** Oppose

**Proposal 158:** Oppose

**Proposal 159:** Support

**Proposal 160:** Oppose

**Proposal 161:** Support

**Proposal 162:** Support

**Proposal 163:** Oppose

**Proposal 164:** Oppose

**Proposal 165:** Oppose

**Proposal 166:** Oppose

**Proposal 167:** Oppose

**Proposal 168:** Support

**Proposal 169:** Support



February 23rd 2023

Subject: Nushagak Stock of concern action plan. Institute at a minimum the following plan created by the BBSRI, advisory committees and the department. Please consider additional points to make the plan more effective.

- 1) Open drift and gill net fishing for the Nushagak District when the Nushagak sockeye escapement has reached one of the 6% of the total estimated run at the Nushagak sonar site.
- 2) Result of the above would be to open the Nushagak district sockeye fishery on June 25-26 instead of the traditional June 21-23. The King run passes at 5% per day and this would allow additional 20% of the run to pass.
- 3) In addition to the above, a hard opening of the Nushagak District sockeye fishery on June 28<sup>th</sup> would occur regardless of escapement goals. This is the traditional date when 60% of the king run has passed.
- 4) All the above would be independent of a Wood River Special Harvest. Fishing could open earlier in the Wood River Special Harvest Area to minimize commercial economic impact.
- 5) The above opening would be dependent on meeting the Wood River OEG.
- 6) Wood River Special Harvest Area net mesh size not to exceed 4.75 inches.
- 7) Closure of the Wood River Special Harvest Area would be dependent on either opening of the Nushagak District fishery and/or protecting the McClung king run (historically later than the Nushagak king run).
- 8) Manage the subsistence fishery inside of the existing regulations
- 9) Sport fishing annual bag limit reduced to 1 mature king over 28 inches, plus one king 20-28 inches, plus 5 king jacks. If the in river King escapement is projected to exceed 95,000 Sport Fish limits increased to 1 fish over 20 inches daily and 4 fish over 20 inches annually.

In summary, I believe the Nushagak king fishery is stressed due to sockeye nets being in its waters too early in the season and for too many hours of the day. Thus, the passage and survival of kings is currently being challenged to the point of extinction with current fishing practices. BOF has to change fishing practices to ensure their survival.

The above changes will help. Additional practices need to be implemented. It appears the managers are being required to manage escapement during the overabundance of Sockeye returning with tools designed for much smaller runs.

Additional tools that need to be implemented to ensure survival of the Kings.

District wide 4.75" mesh mandate allows more efficient catch rates and less net time in water.

15 percent of total sockeye run escapement past the sonar at portage creek to open the district, with a Hard opening of Drift and Set net sockeye fishery in the Nushagak district on June 28<sup>th</sup> Ensures King escapement and survival . The commercial fishery still remains economically viable.

Reduce the fishing hours in the district from 18 hours per day to 12 hours per day allowing passage of Kings throughout the run period to increase age and size diversity.

Thank you Larry L Sidor

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 11: Support With Amendments  
Proposal 12: Support  
Proposal 13: Support



**Submitted by:** Ted Sidor

**Community of Residence:** Honolulu, Hawaii

**Comment:** 11,12,13

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Proposal 11: Support  
Proposal 12: Support  
Proposal 13: Support  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
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Proposal 163:

Proposal 164:  
Proposal 165:  
Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:

**Submitted by:** Lorali Simon

**Community of Residence:** Palmer

**Comment:** My family relies on the Kenai dipnet fishery for our annual harvest.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** William Simpson

**Community of Residence:** Sterling, AK

**Comment:** I harvest my fish for freezing, canning, smoking and pickling for the winter, I think the current regs are sufficient.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** John Sims

**Community of Residence:** Palmer, AK

**Comment:** I subsistence fish for my family, I go with my foster sons and all family members

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

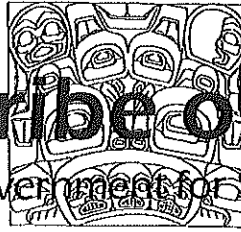
**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**





# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



February 21, 2023

## **RE: Sitka Tribe Comments on 2023 Statewide Board of Fisheries Proposals**

**Oppose: 155,166, and 167**

**Support: 165, 169**

Dear Board Members,

I write on behalf of the Sitka Tribe of Alaska (STA), Tribal government in Sitka, Alaska, with over 4,500 tribal citizens. As a tribal government, STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens. STA submits the following comments on the 2023 statewide finfish proposals.

### **Proposal 155 – Oppose**

This proposal would apply to all sockeye systems within STA's traditional territory, including the heavily utilized Redoubt Bay. There was an attempt at the 2022 AC meeting to amend existing proposals to include this type of spear fishing, but it failed. The main issue is having two gear groups (spear fishers and dip netters) in the same area. Dip netters only have a couple of places to fish at Redoubt and I received complaints about spear fishers fishing in those areas and displacing dip netters. These conflicts will exist until boundaries are established in regulation that separate these user groups. Requiring regional or system management plans identify these boundaries in regulation prior to allowing this type of spear fishing would minimize these conflicts.

### **Proposal 165 - Support**

While STA is not opposed to the use outfitters or water taxi services to access subsistence resources, it is opposed to the use of charter services for the harvest those resources. If it's illegal for subsistence harvesters to monetarily profit from the sale of substance harvested foods, then it should also be illegal for charter operators to profit from such harvest.

### **Proposal 166 - Opposed**

STA is opposed to a "one size fits all" statewide bag limits. Bag limits are more effective when established by region and can be tailored to individual systems.



**Proposal 167** – Opposed

This proposal would require subsistence harvesters to report the amount harvested within 5 of participating in a subsistence fishery. This creates undue burden on the permit holder and the data in most cases wouldn't be utilized in season by managers. The only scenario where in season reporting would benefit the management of a fishery is when a given stock may be in decline but can still support a subsistence harvest. Managers should be able to make this reporting a requirement on existing permits for specific fish stock rather than a general requirement for all systems.

**Proposal 169** - Support

STA supports the inclusion of new species to the banned invasive listing. Changing environmental conditions associated with global warming could provide favorable habitat for invasive species that could negatively effect on indigenous flora and fauna in Alaska.

If you have any questions regarding these comments contact STA's Resource Protection Director at (907)747-7469 or email [jeff.feldpausch@sitkatriben-sns.gov](mailto:jeff.feldpausch@sitkatriben-sns.gov).

Sincerely,

Lawrence Widmark  
Council Chair

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 155: Oppose  
Proposal 165: Support  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 169: Support

**Submitted by:** Joe Ray Skrha

**Community of Residence:** Kenai

**Comment:** I moved to Kenai in 1984 and have practiced law in Alaska for 39 years. I have also fished in Alaska for over 40 years. I have been a professional drift boat guide and personal use fisherman for much of the 39 years. I live on the mouth of the Kenai River, mile 3.2 and I am on the river most days during the dip season. I take families without dads or those that cannot afford a boat or elderly out daily. No consideration is given but a smile and thanks. I try to give back to the community as much as I can and have never charged or even taken a donation for my services. I believe that all fish including salmon belong to the good people of Alaska and people need access to safe, healthy protein. I am privileged to be able to still fish sockeyes after climate change and the burning of fossil fuels have all but killed off our mighty King Salmon.

I OPPOSE Proposals 163-167. Most of the people fishing the personal use Kenai River fishery and residents fishing with residents; mom and dads with kids or grand parents. There are a few guides on the mouth but they are already registered. I strongly believe that personal use should be freely regulated so every Alaskan who wants fish, can get them. Limiting the location to just where you live is also wrong. People need access to all fish. While sockeyes run in the Kenai, you rarely get a silver or king. People should be able to go other rivers to get different fish. The only limitation I would like to see in the lower Kenai River dip netting area is 55 HP limit for all boats. Believe me, I have a 20 foot Lund with a 55HP Yamaha and I am scared when giant jet boats go by. Three small crafts were sunk by large wakes that I saw during the 2022 season. Finally, we all carry personal use permits. We turn them in after the season. No need for 5 day reporting. It's not necessary and is arbitrary and capricious to implement.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Personal Use fishing is a right as sacred as free speech in Alaska. Fish belong to all Alaskans according to the Alaskan Constitution. Don't restrict peoples right to food.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Mark Sletten

**Community of Residence:** Anchorage

**Comment:** I was born and raised in Alaska and then chose to serve in the military and am currently stationed here. I will retire in Anchorage in a couple of years and love the freedom we have as residents to fish and dipnet. I go with friends each year and urge you to keep this quintessential Alaskan tradition alive.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Sean Smart

**Community of Residence:** Kenai, Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Dennis Smedley

**Community of Residence:** Wasilla, AK

**Comment:** As a former commercial fisherman who still has his Kodiak seine permit, I am aware of the challenges that come with commercial fishing. While I do not commercial fish any more, I enjoy catching fish with a dip net. My family has dipnetted at the Kenai River and Kasilof Rivers (off the beach) since approximately 2007. Fish and Game has done a good job protecting the resources.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Michael Smith

**Community of Residence:** Anchor Point, AK

**Comment:** I have dip netted with my family at Chitina and China Poot. I have been to the circus at Kasilof and Kenai but never fished. I do not believe personal use dip netting affects salmon popularions in any significance. The personal use fisheries are the best, most fun, and healthiest way to catch the high protein high omega 3 for our family in adequate amounts.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Personal use fisheries do not significantly impact populations. Commercial netting, open ocean trawling, plastic pollution, killing the large historic brood stock does.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163: Oppose**

**Proposal 164: Oppose**  
**Proposal 165: Oppose**  
**Proposal 166: Oppose**  
**Proposal 167: Oppose**  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Kelly Smith

**Community of Residence:** Copper Center Alaska 99573

**Comment:** We dip net from a boat because it's the safest way to harvest fish. Every year someone dies on the copper river from improperly tying them selves off or not tying themselves off at all. I grew 20 miles away from the Copper river and as a lifelong Alaskan have come to rely on our local salmon as a main protein source .

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Ted Smith

**Community of Residence:** Soldotna

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** Ted Snider



**Community of Residence:** Anchorage, AK

**Comment:** I have lived in Alaska since I was 9 months old. I have dip netted in the kenai, fish creek, and kasiloff. In the past and have dipnetted on the copper above the bridge since I now own property near copper center. I use a guide as I am 59 and have an artificial knee. Guide makes it so I can safely dipnet in the copper river. I am tired of outside commercial fisherman ruining fishing for Alaskans

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	





# Southeast Alaska Fishermen's Alliance



PC456  
1 of 3

1008 Fish Creek Rd

Juneau, AK 99801

Email: [kathy@seafa.org](mailto:kathy@seafa.org)

Cell Phone: 907-465-7666

Fax: 907-917-5470

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

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February 22, 2022

Marit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 999811

RE: 2023 Statewide Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species commercial fishing association with approximately 300 members mainly focused on Southeast salmon, crab, shrimp and Gulf of Alaska longline fisheries.

**Proposal #153 - Comment:** We are supportive of developing language to clarify how the escape mechanism in rigged collapsible style pots would work. Aligning regulatory language between both federal and state agencies would be beneficial to the fishermen. Unfortunately, we can't provide unqualified support for the proposal until we see the RC language that will be submitted on this proposal later.

**Proposal #156 – Support:** We support this proposal to prohibit the use of felt soled footwear while personal use fishing in freshwater. We support aligning the sport fishery and personal use fisheries regulation to ban the potential harmful transfer of invasive species.

**Proposal #159 – Oppose:** We oppose this proposal to close commercial fishing for any given species within one-fourth of a mile of any area closed to sport or personal use fishing for that species. ADF&G is a conscientious manager that seriously takes to heart their requirement to manage sustainably and is in the best position to determine if an adjacent area should be closed based on conservation of the species. At the minimum, it should not be a statewide proposal but considered at an individual species and stream basis.



**Proposal #160 – Oppose:** We oppose this proposal that would require the surrender of proceeds gained from the sale of wild king salmon caught in hatchery terminal harvest areas. The Board of Fish already provides the Dept with guidance at the local and regional level. For example, in Southeast Alaska we have several stock of concern management plans and the Pacific Salmon treaty, periods and locations with no-retention that already directs ADF&G on local management. This proposal causes significant unintended consequences throughout by trying to manage on a statewide basis.

**Proposal #161 – Support:** We support this proposal to establish a policy regarding the management of groundfish fishery resources in waters of Alaska. The policy objectives outlined in the proposal are reasonable and provide for sustainable management.

**Proposal #163 – Support:** We support prohibiting guiding in personal use finfish fisheries. In personal use and subsistence fishing, direct expenses can be shared but actually acting as a guide and chartering a vessel for personal use fishing should not be allowed.

**Proposal #164 – Comment:** We don't believe that guiding and transporting of personal use fishermen is appropriate as stated in comments for proposal #163 and #165 and therefore a registration and reporting requirement for guides and transporters is inappropriate. We do believe that all fishery resources harvested should be reported from all fisheries including sport, personal use, subsistence and commercial as it is necessary information for accurate and sustainable management.

**Proposal #165 – Support:** We support prohibiting compensation for guide services in subsistence fisheries. Subsistence fishing is by definition a customary and traditional activity and guiding is not a customary and traditional practice. Subsistence fishermen can share direct expenses of a fishing trip as is appropriate but paying for being guided is not an acceptable expansion of traditional subsistence activities.

**Proposal #166 – Comment:** We support reporting of personal use finfish fisheries. You need to know what is being removed from the water to sustainably manage the fishery.

**Proposal #167 – Support:** We support the requirement of in-season reporting of subsistence, sport and personal use fish. Passing this requirement would ensure real time data for managers to make informed, responsible decisions and allow for conservation management actions when necessary to protect the resource.

**Proposal #168 – Support:** We support ADF&G proposal to allow the extension of emergency order authority to allow restrictions of sport fisheries in contaminated waters. This still allows the Dept to close the sport fishery if appropriate. The reason to either close or allow sport



fishing in contaminated waters is for the protection of human health from fish that have become contaminated.

**Proposal #169 – Support:** We support the Departments proposal to amend the list of banned invasive species.

During your misc. agenda topics, you might consider discussing a five-year board of fish cycle as it appears that ADF&G is stretched too thin to deal with 3 regulatory meetings a year and provide the best up to date information, as well as providing the public and advisory committees staff comments in a timely manner.

We do not have any on-time comments for the hatchery committee meeting as there isn't even an agenda yet to review your discussion topics, but we are very supportive of the Alaska state hatchery program.

Thank you for your consideration of our opinions on the Statewide Board of Fish proposals for consideration in March. When Staff reports become available and the language for Proposal #153 becomes available, we might submit additional comments.

Sincerely,

Kathy Hansen  
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 156: Support  
Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161: Support  
Proposal 163: Support  
Proposal 164: Support  
Proposal 165: Support  
Proposal 167: Support  
Proposal 168: Support  
Proposal 169: Support



SSRAA  
Southern Southeast Regional Aquaculture Association, Inc.  
14 Borch Street, Ketchikan, Alaska 99901  
P: 907.225.9605 F: 907.225.1348

January 16, 2023

Alaska Board of Fisheries  
Marit Carlson-Van Dort, Chair

**Re: Oppose Proposals 159 and 160 Statewide Finfish and Supplemental Issues**

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

Thank you for the opportunity to comment on the proposals you will consider at the above-referenced meeting. Southern Southeast Regional Aquaculture Association (hereafter "SSRAA") is a regional non-profit salmon hatchery organization formed under state and federal law, and which was originally incorporated in 1976. SSRAA is governed by a 21-member board of directors who represent a cross section of regional salmon users, communities, and members of the public. The SSRAA Board is in opposition to Proposals 159 and 160 for the reasons listed below-

**PROPOSAL 159 - 5 AAC 39.XXX. New Section.**

This proposal as written will have unintended negative consequences throughout the state because of a local, site specific concern. The proposer speaks to salmon, but how will this proposed language potentially affect other commercially harvested species? It appears that there could be numerous examples of shrimp and crab commercial harvest that could come under this "¼ mile of closed waters" wording. When mop up fisheries are deemed necessary, the department takes into account local stock run timing to allow for their protection. Conducting these fisheries for their intended purpose is strategically allowed in a controlled fashion, and is not compatible with other users.

**PROPOSAL 160 - 5 AAC 39.XXX. New Section.**

This proposal as written will have unintended negative consequences throughout the state, and is not necessary. Fishermen fishing in terminal harvest areas in Southeast Alaska are currently under non-retention in that area if chinook salmon are not released from that site. In areas where chinook are released, size and time restrictions are imposed by local area management biologists to mitigate any potential impact on wild feeder fish, and modifications are made to regulations to conserve sensitive Chinook salmon spawners that may be transiting THA's. Since statehood, Alaska has employed local knowledge and management of its fisheries that have served the state and the users of the resources well. I would encourage the Board to allow local managers in this area to appropriately address any real concerns, and not create regulations that are unnecessary and will not effectively address the varied management needs throughout the state.

Sincerely,

Susan Doherty, General Manager SSRAA

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 159: Oppose  
Proposal 160: Oppose

**Submitted by:** Rita Spann

**Community of Residence:** Cordova, Alaska

**Comment:** I strongly support proposals 163, 164 and 165. Commercial guiding in subsistence fisheries undermines the intent of subsistence management.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

<b>Proposal 11:</b>	<b>Proposal 156:</b> Support	<b>Proposal 164:</b> Support
<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Support
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Support
<b>Proposal 82:</b>	<b>Proposal 159:</b> Oppose	<b>Proposal 167:</b> Support
<b>Proposal 87:</b>	<b>Proposal 160:</b> Oppose	<b>Proposal 168:</b> Oppose
<b>Proposal 153:</b> Support	<b>Proposal 161:</b> Support	<b>Proposal 169:</b>
<b>Proposal 154:</b> Oppose	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Support	

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**Submitted by:** Jeremy Spargur

**Community of Residence:** Fairbanks, AK

**Comment:** I have been using charters on the copper River for many years. It's a quick and efficient way to get the salmon I want for the year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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<b>Proposal 12:</b>	<b>Proposal 155:</b>	<b>Proposal 161:</b>
<b>Proposal 13:</b>	<b>Proposal 156:</b>	<b>Proposal 162:</b>
<b>Proposal 82:</b>	<b>Proposal 157:</b>	<b>Proposal 163:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 158:</b>	<b>Proposal 164:</b> Oppose
<b>Proposal 153:</b>	<b>Proposal 159:</b>	<b>Proposal 165:</b> Oppose

Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** Ronnie Spencer

**Community of Residence:** Oxford, Michigan

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Mark Spencer

**Community of Residence:** Chitina

**Comment:** I oppose 163, 164, 165, 166 & 167.

I have been operating Dipnet Charters for over a decade on the Copper and Kenai Rivers. My business has grown over the years as Alaskan's have sought alternative ways to access these fisheries that did not include wading into the fast-moving waters or dangling off cliff faces.

Land access is limited, overcrowded, and dipping from the shore is dangerous. There have been numerous fatalities in both the Subsistence and Personal Use fisheries on the Copper River with all these accidents propagating from dipnetters fishing from the banks or wading into the swift water.

Being an expert in navigating these drainages we provide a level of safety residents unfamiliar with local riverine conditions or who do not have a dipnet, a boat or the skills to safely operate a boat in these waters but still want the dignity of being able to harvest their catch with friends and family.

The young, elderly and disabled especially benefit from chartered access. Knowledge transfer only happens when our elders can demonstrate and participate in a fishery with their children and grandchildren. Taking part in the harvest is inherently at the root of who we are as Alaskans and further restricting subsistence and personal use erodes the pride we all share in harvesting food for ourselves and loved ones.

There will be unforeseen consequences on residents who travel from their villages to other parts of the state to harvest fish that aren't available to harvest them in their region by either a low return year for them or that protein is not historically available to them. Understand if you support the subsistence and personal use charter ban you would be restricting access to thousands of Alaskans whose only concern is to safely access a fishery to feed their family. There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access.

I urge you to oppose I oppose 163, 164, 165, 166 & 167 and keep chartered access open to our Alaskan families.

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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Finley Spencer

**Community of Residence:** Anchorage, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:





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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Erin Spenser

**Community of Residence:** Glacierview, AK

**Comment:** My family participates in the Southcentral subsistence and PU fisheries. As a disabled veteran the only access to these fisheries has been via a charter service. Last season I was not able to participate in the Glennallen State subsistence fishery because I was not able to get off work on the days the Chitina personal use fishery was open. For over a decade we used a charter service to provide us access to the copper river where I could fish from a boat safely. When the board ban charter access to this fishery in 2022 we did not have any options to harvest fish as I am not able to wade into waters. We went without.

I OPPOSE Proposals 163-167. These five proposals are born of a lack of understanding of how Alaskans access these fisheries and we should not be forced off the safety of a boat and herded into the surf and currents where I do not belong. My family struggles with food insecurity and proposing hurdles and prohibiting safe access is unacceptable.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten my rights as an Alaskans and are the built on the 2021 ban proving we have already fell down on "the slippery slope" to unequitable access to a state owned resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them as the unintended impact on our families and communities is immeasurable when compared to the fear mongering by commercial fishing interests who hope to force us all to the grocery store taking away our dignity to provide for ourselves and our families.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Rita Joy Stancel

**Community of Residence:** Anchorage



**Comment:** I fish for subsistence. I fish in South Central and dipnet the Copper by charter. I take my grown daughters (2) fishing. I use a charter on the Copper because I am physically unable to fish the swift water from shore.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Doralee Stancil

**Community of Residence:** Eagle River, AK

**Comment:** We own property on an airstrip in Kenia (Kalifonsky Airpark) off of Bouy road which we purchased for the sole purpose of being able to come down with family and friends to go dip netting each year. We depend on the dip net season to provide us with the fish we will need for the year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.



Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Joseph E. Stancil Jr.

**Community of Residence:** Eagle River, Alaska

**Comment:** We have airport property that is located 3 miles from the mouth of the Kenai River (off of K-Beach road), I am 75 yrs. old and my Wife is 65 yrs. old. The only reason that we have this property is fly our airplane from Birchwood Airport to this "Fish Camp" is for the opportunity to Dip Net the Kenai & Kasilof Rivers. We are both boat & bank Dip Netters.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 155:	Proposal 161:
Proposal 13:	Proposal 156:	Proposal 162:
Proposal 82:	Proposal 157:	Proposal 163: Oppose
Proposal 87:	Proposal 158:	Proposal 164: Oppose
Proposal 153:	Proposal 159:	Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose

Proposal 168:  
Proposal 169:



**Submitted by:** John Stauffacher

**Community of Residence:** Sterling, Alaska

**Comment:** I have been a sportsfisherman on the Kenai Peninsula for 25 years.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** David Steggell

**Community of Residence:** Fox Island

**Comment:** February 15th 2023

Subject: Nushagak Stock of concern action plan. Institute at a minimum the following plan created by the BBSRI, advisory committees and the department. Please consider additional points to make the plan more effective.

- 1) Open drift and gill net fishing for the Nushagak District when the Nushagak sockeye escapement has reached one of the 6% of the total estimated run at the Nushagak sonar site.
- 2) Result of the above would be to open the Nushagak district sockeye fishery on June 25-26 instead of the traditional June 21-23. The King run passes at 5% per day and this would allow additional 20% of the run to pass.

- 3) In addition to the above, a hard opening of the Nushagak District sockeye fishery on June 28th would occur regardless of escapement goals. This is the traditional date when 60% of the king run has passed.
- 4) All the above would be independent of a Wood River Special Harvest. Fishing could open earlier in the Wood River Special Harvest Area to minimize commercial economic impact.
- 5) The above opening would be dependent on meeting the Wood River OEG.
- 6) Wood River Special Harvest Area net mesh size not to exceed 4.75 inches.
- 7) Closure of the Wood River Special Harvest Area would be dependent on either opening of the Nushagak District fishery and/or protecting the McClung king run (historically later than the Nushagak king run).
- 8) Manage the subsistence fishery inside of the existing regulations
- 9) Sport fishing annual bag limit reduced to 1 mature king over 28 inches, plus one king 20-28 inches, plus 5 king jacks. If the in river King escapement is projected to exceed 95,000 Sport Fish limits increased to 1 fish over 20 inches daily and 4 fish over 20 inches annually.

In summary, I believe the Nushagak king fishery is stressed due to sockeye nets being in its waters too early in the season and for too many hours of the day. Thus, the passage and survival of kings is currently being challenged to the point of extinction with current fishing practices. BOF has to change fishing practices to ensure their survival.

The above changes will help. Additional practices need to be implemented. It appears the managers are being required to manage escapement during the overabundance of Sockeye returning with tools designed for much smaller runs.

Additional tools that need to be implemented to ensure survival of the Kings.

District wide 4.75" mesh mandate allows more efficient catch rates and less net time in water.

15 percent of total sockeye run escapement past the sonar at portage creek to open the district, with a Hard opening of Drift and Set net sockeye fishery in the Nushagak district on June 28t Ensures King escapement and survival . The commercial fishery still remains economically viable.

Reduce the fishing hours in the district from 18 hours per day to 12 hours per day allowing passage of Kings throughout the run period to increase age and size diversity.

Thank you

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Proposal 165:  
Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:

**Submitted by:** David Stettenbenz

**Community of Residence:** Wasilla, Alaska

**Comment:** I fish for subsistence for family. I fish with Ryan Ford. He's very professional and knows the river well. He's a small business owner this proposal would be an extreme hardship on him.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Melissa Stevens

**Community of Residence:** Wasilla AK

**Comment:** I love to fish it is a huge part of why I live in Alaska.. I fish all over Alaska. I have been a resident of Alaska for over 30 years.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Tiffie Steward

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Kyle Steward

**Community of Residence:** Palmer

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Aaron Stocks

**Community of Residence:** Soldotna, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Sharon Strutz-Norton



**Community of Residence:** HOMER, AK

**Comment:** I am a lifelong Alaskan - Inupiat and Caucasian descendent, myself, my family, friends and neighbors have subsistence fished over many years. Alaskans should have the right to continue to subsistence fish for salmon now and ongoing for future generations. Additionally, I served in the US Army and I am VA nurse I am very aware that veterans [those disabled and those not] and their families and fellow veteran subsistence fish. Both my family and veterans' subsistence fish in order to meet their food and nutritional needs without which many would suffer due to the US and State economy and the high cost of food; and may have to depend on State Welfare and food banks which is not what anyone should want. Being able to provide for ourselves and our families is paramount to an individual's self-esteem. Banning or restricting access and opportunity would harm the physical, psychological/mental health, and wellbeing of thousands of Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Nancy Stryken

**Community of Residence:** Anchorage, Alaska

**Comment:** Kasiloff, Kenai. I have 3 brothers and myself been here sense 1970. We fish for food. Lots of people depend on it.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kevin Sudbeck

**Community of Residence:** Kenai, AK

**Comment:** I'm a resident of Kenai, Alaska. I'm a retired Naval Aviator and I love to fish in Alaska. Have been fishing in Alaska since 1997 and want to continue fishing the Kenai, Homer and Seward areas.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Sun'aq Tribe of Kodiak

**Community of Residence:** Kodiak, Alaska

**Comment:** We are submitting this comment in partial support and partial opposition to Proposal 169, "Classification of banned invasive species."

In 2002, invasive signal crayfish (*Pacifastacus leniusculus*) were first reported in Buskin Lake, the main lake of the Buskin Watershed, in Kodiak Island. The Buskin Watershed is located five miles southwest from the city of Kodiak, and supports one of the largest subsistence salmon fisheries in the Kodiak/Aleutian Islands Federal Subsistence Region. The watershed itself has 11.2 miles of streams and several lakes, the largest of which is Buskin Lake.

Both the USDA Forest Service and the Alaska Aquatic Nuisance Species Management Plan have listed the signal crayfish as one of the highest potential threats to Alaska. The method of introduction of signal crayfish into the Buskin Watershed has yet to be determined, but fortunately thus far they have been found nowhere else in Alaska.

Sun'aq remains gravely concerned about the presence of signal crayfish in the Buskin River Watershed, particularly how this invasive species will impact the wild salmon stocks vital to the subsistence culture and lifestyle of Sun'aq tribal members and non-members alike, and we feel it is essential to resume public capture of signal crayfish in order to contain, control, and work towards eradication of this invasive species.

Last fall we submitted an ACR for consideration at this Board of Fisheries meeting, and are very disappointed to see that it was not taken up for consideration, public discussion, and debate amongst the members of the Board. Our proposal was meant to be complimentary to the proposal ADF&G has submitted amending 5 AAC 41.075 by creating different classes of banned invasive species, with methods and means specifically targeting signal crayfish.

Our proposed amendment stated:

Within the Buskin Watershed of Kodiak Island, public harvest of signal crayfish is permitted with no closed season and no bag limit, through the use of hand capture, dip nets, and traps with at least one opening at least 2 inches in diameter; and the owner's first initial, last name, phone number, and home address clearly marked and affixed to a keg or buoy attached to the trap per shellfish regulation 5 AAC 47.035, Methods, means, and general provisions – Shellfish

In other parts of the world experiencing invasive signal crayfish invasions, including the British Isles and Scandinavia, the presence of established populations have had a direct negative impact on both resident and anadromous salmonids, through both predation of eggs and juveniles, as well as overall ecosystem alterations caused by the crayfish. We remain concerned the same may happen, or may already be occurring in the Buskin Watershed, and it is imperative to resume public capture to aid efforts in containment and control efforts due to the limitations of budgets, time, and staffing realities.

While we recognize the intent of the current regulation as a means to safeguard against accidental, unintentional, or deliberate transportation of invasive species beyond existing areas they have colonized, and we empathize with the thought process of ADF&G with this new regulation, by disallowing public capture of crayfish our abilities to control this invasive population have been significantly impeded. Due to myriad factors, not the least of which are budget, time, and staffing constraints, the only real way we can hope to control and work towards eradication of this invasive species is a blend of our efforts along with a partnership of the public and ADF&G. Central to this will be concerted efforts of outreach and education. For instance, we envision emulating the successes the Department has had at invasive Northern pike control and eradication as a model for what we can accomplish with invasive signal crayfish in the Buskin Watershed. Furthermore, the provision that crayfish may only be consumed on site may not be aligned with the wishes nor legal activities permitted by the United States Coast Guard (the landowners of Buskin Lake), and instead we feel this requirement needs to be dropped from the new proposed regulation.

Disallowing public capture of crayfish significantly undermines our ability to control this invasive species, which likely has a direct impact on anadromous salmonids, particularly sockeye salmon and the subsistence and sport fisheries reliant on healthy, robust returns within the Buskin Watershed. Not solving this issue will

continue to cause us to not have the ability of the public's assistance in control efforts of signal crayfish, which will greatly diminish our efforts at keeping crayfish at manageable levels, and in particular attempting to further reduce the signal crayfish population within the Buskin Watershed.

Sun'aq Tribe of Kodiak has taken an active role in efforts at signal crayfish eradication and control in the Buskin Watershed (including research), and from our experience and what we have learned and observed, allowing public capture is an essential and critical component for containment and control of this invasive species.

We appreciate the Department's interest in rectifying this regulation which restricts signal crayfish harvest, but we request the Board to please consider removing the proposed provision that signal crayfish may only be consumed on site at Buskin Lake. We also ask the Board to consider developing a list of permissible methods and means of crayfish capture (such as what we proposed), to aid the public in better understanding what is legal and to ease enforcement burdens on local Alaska Wildlife Troopers. Furthermore, we feel that specific methods and means will minimize bycatch and prevent negative impacts to non-target species within the Buskin Watershed.

Quyanaa (thank you) for your interest in this matter.

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Proposal 169: Support With Amendments

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**Submitted by:** Greg Svendsen

**Community of Residence:** AK

**Comment:** Born in Anchorage 75 years old. Have been fishing the Kenai river since I was 10 years old with my family. Parents now deceased, daughter, wife, and grandson, and son in law. The comm. boys get 80% of the fish and a sports caught fish is worth 10X more to the economy as a comm. caught fish. 50% of people in Alaska live in South Central the comm. boys get more than their fair share now why do they deserve more. This a chance for families to be together, fill their freezers and enjoy the outdoors. These fish belong to all of us not just the comm. fleet.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my



harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Gwen Swanson

**Community of Residence:** Anchorage, Alaska

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Andrew Swartz

**Community of Residence:** Eagle River, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Steven Swartzbart

**Community of Residence:** Cordova

**Comment:** Proposal 154- Oppose

I believe the board should not pass this proposal for two reasons that would negatively impact the seine fisheries in the State. This would lower the numbers of jobs for seine crew because drum seining requires less crew to operate. There would also be a large expense to the captains to convert to drum seining.

Proposal 156-Support

If passed this would be consistent with sport regulations on felt sole waders and have a positive impact on the environment.

Proposal 159- Oppose

Proposal 160- Oppose

### Proposal 163- Support

I urge the board to pass this proposal. People should not be profiting financially from personal use fisheries. The commercialization of personal use will only rise if the board does not take action now. These loopholes provide people with financial opportunities in fisheries that are meant for Alaska's to feed their families with salmon and not for financial benefit

### Proposal 164- Support

### Proposal 165- Support

I urge the board to pass this proposal. People should not be profiting financially from subsistence fisheries. The commercialization of subsistence will only rise if the board does not take action now. These loopholes provide people with financial opportunities in fisheries that are meant for Alaska's to feed their families with salmon and not for financial benefit

### Proposal 166-Support

The board should pass this proposal to limit people taking more than their fair share. Bag limits are set with a specific number of users in mind, if all people caught limits in two areas rather one, that essentially doubles the number of users. This is already implemented in hunting regulations in the state. It makes sense this precedent should carry over to fisheries.

### Proposal 167- Support

I urge the board to pass this proposal. Alaskan fisheries use scientific and abundance based management strategies. For this management style to work effectively biologist at ADF&G need timely data. In season reporting will only improve the amount of important data biologist need for making crucial management decisions. This is already a proven and valuable tool used in commercial fisheries. I am a subsistence fisherman and view this proposal as a way to improve the fisheries that I rely on.

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**Proposal 13:**

**Proposal 82:**

**Proposal 87:**

**Proposal 153:** Support

**Proposal 154:** Oppose

**Proposal 155:**

**Proposal 156:** Support

**Proposal 157:**

**Proposal 158:**

**Proposal 159:** Oppose

**Proposal 160:** Oppose

**Proposal 161:** Support

**Proposal 162:**

**Proposal 163:** Support

**Proposal 164:** Support

**Proposal 165:** Support

**Proposal 166:** Support

**Proposal 167:** Support

**Proposal 168:** Oppose

**Proposal 169:**

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**Submitted by:** G. Bruce Talbert

**Community of Residence:** Kenai, Alaska, Kenai River

**Comment:** I have lived and fished on the Kenai River since the mid 1980's. I have also fished and enjoyed fishing in Kachamak Bay and the surrounding areas. I have also commercial fished several years in Bristol Bay.

I have seen a decline in King Salmon in the Kenai River and a decline in Halibut. The commercial fisheries for Red Salmon seems to remain strong. Commercial fishing for Halibut has seen restrictions over the years.

It appears that Sport Fishing provides the most \$\$\$\$ to the State of Alaska and local communities. I realize commercial fishing is important to the Economy of Alaska and to the financial well being of most commercial fishermen. The amount of fish taken Sport Fishing, including personal use and subsistence fishing is a small percentage compared to the take of commercial fishing. To restrict and ban Alaskans the opportunity to





personal use and subsistence fishing would be unfair and not an acceptable. I would oppose any of the proposals coming from the Commercial Fishermen.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** David Talbert

**Community of Residence:** Willow, ak

**Comment:** Leave my fish alone as an Alaska resident. If anything we should cut back on commercial fishing. Are they that greedy. I have dipnetted for 30 years.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Tristan Taliesin

**Community of Residence:** Kenai,, Ak

**Comment:** I am a Disabled veteran with a BTK Amputation. I have 3 children and my father that my fishing provides subsistence for all year! I have lived in Alaska most my life and I own property in Kenai. My father retired from the business he owned for 35 yrs in Anchorage. I was raised dip netting!

My family fish do Subsistence and survive through the winter on our catch through dipnetting and sport catch from the summer. The fishing Subsistence is what makes living in SSD possible.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Chip Tamagni

## Community of Residence: Soldotna

**Comment:** Love to fish for both sport and food. Your commercial fishermen are the problem in the Cook Inlet. They generate about 1/10 the revenue for the state pound for pound compared to sport caught fish. They lie about their bycatch of kings. Shut their asses down. I have personally watched dip netters take well over their limits day after day. Just go undercover down at Centennial park. I have watched the same guy stay for two weeks, with the same people fish every day and bro g back ice chest after ice chest. Contact me and I will point the mf out. Camps at the same spot each year.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Bill Tappan

**Community of Residence:** Soldotna, Alaska

**Comment:** I am an 83-year-old retired corporate executive and have been fly fishing in Alaska since the mid-1950s. I am on the Kenai Peninsula Chapter of Trout Unlimited, a member of Kenai River Sportfishing Assn., I am on the Kenai River Special Management Area Advisory Board (9-years) and served on the Kenai-Soldotna Fish and Game Advisory Board (9-years). I teach fly tying as a volunteer to Kenai Middle School children and teach privately.

I fly fish most all of the productive Kenai Peninsula area streams and rivers and numerous other watersheds off the Peninsula.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.



Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

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**Submitted by:** Reid Ten Kley

**Community of Residence:** Vancouver

**Comment:** I support the strategies devised by proposal 12 to limit the impact on king salmon escapement while also preserving the commercial harvest of sockeye on the Nushagak and Wood River systems.

I would also like to see more data gathered on the number of kings that might not be counted by the traditional counting methods since the size of kings returning has greatly decreased in recent years. Perhaps crowd-sourced location data from the commercial fleet on kings harvested, maybe using a fish trap/weir near the counting stations to provide clarity on the percentage of fish passing that are counted by the sonar as sockeye but might in fact be small kings.

If we employ additional techniques and gather additional data, then managers can make a better plan to protect kings while not disrupting the valuable sockeye harvest.

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Proposal 13:	Proposal 158:	Proposal 166:
Proposal 82:	Proposal 159:	Proposal 167:
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163:	



**Submitted by:** Martin Thurber

**Community of Residence:** Kenai, AK

**Comment:** I dipnet along north K beach. I rely on dipnetting to put fish in my freezer.

I don't have time to compete with tourists.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Perry Timme

**Community of Residence:** Farmington, New Mexico

**Comment:** Please consider allowing one non pelagic rockfish per day except for yelloweye. At least consider one quillback. There are days I catch 100/day. Don't allow fishing guides and clients to keep non pelagic species.

Alaska needs to get rid of a significant amount of sea otter. They are decimating the shellfish in SE Alaska. The native Americans can't keep up with their reproduction.

Thanks

Perry

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Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:



**Submitted by:** Rebecca Timohovich

**Community of Residence:** Fairbanks

**Comment:** This is the only way I am able to get the fish to feed my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Dimitri Timohovich

**Community of Residence:** Fairbanks, Alaska

**Comment:** My family fishes the Copper River with AK Xpeditions because we do not own a boat, nor do we have the intimate knowledge of the River like they do. Banning charters will increase accidents.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Tyler Toth

**Community of Residence:** North Pole, Alaska

**Comment:** I came to Alaska through the military and have been lucky enough to be able to call it my home since 2001. My family fishes all over Alaska, to include Juneau, Valdez, Seward and Chitina.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** James Trombley

**Community of Residence:** Kenai

**Comment:** If this fishery is truly for ALL Alaskans then banning the use of guides is discriminatory against disabled sportsmen and sportswomen as well as those who do not have access to a watercraft and are unable to stand in the water to dip net.

This board needs to continue to stand up for ALL Alaskans who wish to participate in this fishery. To do otherwise would go against the state constitution.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Glen Trombley

**Community of Residence:** Chugiak

**Comment:** Prop 163:

Being a CG Licensed, Insured, KPB Tax paying and ethically minded commercial operator/business involved in providing "Guide Services" in the Upper Cook Inlet Personal Use Area. (Kenai River) I provide safe & knowledgeable access to the fishery for the general public. My user group is vast in scope IE: physically and mentally impaired residents, elderly and able bodied individuals. The participation of all Alaskan residents to partake might not otherwise be an option if it were not for my guide platform and others like it.

RE: Alternative #2....Imposing a Fish Tax based on Market value.

Argument: These fish are not being sold on the market and therefore should have no relation to a dollar value set forth by the Commercial market. OPPOSE

RE: Alternative #3....Imposing a Flat Fee on Commercial operators.

Argument: What pocket book does that pierce....The State of AK or the Commercial fishing fleet? For the statewide number of operators this seems like pennies on the dollar that would cost more to manage then its worth. OPPOSE

RE: Alternative #4...Impose a fee on all PU permit holders to pay for Mgmt. of the Fishery.

Argument: All Residents participating in either Subsistence, Personal Use or Sportfishing already pay a fee, it's called an annual State Fishing License. OPPOSE

This proposal limits and does not promote access, therefore OPPOSE 163.

PROP 164:

Argument:

Although I am currently not required to publicly display that my vessel is indeed a "For Hire" Sport Fishing vessel, I do. (stickered, registered with ADFG etc) with that being said, I am required to be CG Approved, Licensed and Registered as a business with KPB. That has been an on-going effort imposed by the state and local entities for some time.

I do support the effort to signify who is a "for hire" entity on the river. However, the reporting of harvest should remain the responsibility of the client/participant as has always been the case. For those reasons I OPPOSE Prop 164

PROP 165:

Argument:

Although I currently don't provide guide services for "Subsistence" users but rather "Personal Use" users, I do believe that prohibiting compensation for providing access to either option is ultimately removing or at least limiting access options for individuals that cannot provide opportunity on their own. As long as the providing



entity/business meets all CG, State and local licencing criteria, this should be a mute issue. For those reasons I OPPOSE Prop 165

Prop 166: I am Indifferent on this proposal

Prop 167

Argument:

Require in season reporting of harvest within 5 days.

The current given allotted period for reporting seems perfectly adequate, Aug 15th annually. Imposing a 5 day, inseason requirement would likely produce a clerical nightmare for an already understaffed ADFG department. The largest percentage of harvest is done off-shore by the Commercial Fleet, this is a documented fact. By the time these fish have entered fresh water the sonar count should provide enough data to substantiate EO's. For those reasons I OPPOSE Prop 167

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Support With Amendments  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jennie Tschappat

**Community of Residence:** Glennallen, Alaska

**Comment:** My name is Jennie Tschappat and i Grew up in the Copper River Basin. Salmon from the Copper River has always been important source of food for my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Philip Tserlentakis

**Community of Residence:** Anchorage

**Comment:** I go with Rock Skip or Hem&Copper River Charters every year and due to the danger of The Chitna fishery these companies make it possible for me to fill my freezer safely and quickly. I am a life long Alaskan and I oppose shutting down charters on the Copper River. Doing so will make my life and many others more difficult and dangerous. Please do not shut the charters down.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 157:	Proposal 164: Oppose
Proposal 82:	Proposal 158:	Proposal 165: Oppose
Proposal 87:	Proposal 159:	Proposal 166: Oppose
Proposal 153:	Proposal 160:	Proposal 167: Oppose
Proposal 154:	Proposal 161:	Proposal 168:

**Submitted by:** Adam Tudor

**Community of Residence:** Wasilla, Alaska

**Comment:** I fish both the copper river and kenai dipnet subsistence fisheries. This provides food for my family that we other wise could not have. As an Alaskan resident I oppose these restrictions.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Douglas Turnbull

**Community of Residence:** Bloomfield. New York

**Comment:** I travel to Alaska to hunt and fish and this is part of the experience I enjoy.

Please save these opportunities for residence and out of state people that spend lots of money to do these things.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Tommie Turner

**Community of Residence:** Soldotna Ak

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Haley Tyler

**Community of Residence:** Fairbanks, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
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Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Mailing Address:** P.O. Box 20229, Juneau AK 99802-0229

**Phone:** (907) 586-2820

**E-mail:** [ufa@ufa-fish.org](mailto:ufa@ufa-fish.org) **Website:** [www.ufa-fish.org](http://www.ufa-fish.org)

February 26, 2023

Alaska Board of Fisheries  
Board Support Section  
ATTN: BOF Comments  
PO Box 115526  
Juneau, AK 99811-5526

**RE: Support for Proposals 153/161/163/164/165; Opposition to Proposals 159/160**

Dear Chairwoman Carlson-Van Dort,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 37 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast. UFA has taken position on the following proposals for the March 2023 Statewide Finfish and Supplemental Issues Meeting:

**Proposal 153 - Support**

UFA supports developing language to clarify escape mechanisms in regulations for collapsible 'slinky' groundfish pots. However, there are concerns that the language is not available before the public comment deadline and will instead be submitted as an RC during the meeting. There are hundreds of thousands of these pots in use from Southeast to the Bering Sea from several manufacturers. When crafting the definition, UFA supports the need for broad language to prevent making any of these pots illegal.

**Proposal 159 - Oppose**

UFA opposes proposal 159. We oppose these closures as a statewide policy and believe that this issue should be handled by ADF&G or on a regional level. In some areas, particularly THA's, ADF&G's current EO authority and management would be undermined under this policy leaving terminal enhanced fish unable to be harvested.

**Proposal 160 - Oppose**

UFA opposes proposal 160. This proposal causes significant unintended consequences by trying to manage on a statewide basis. Currently, fishermen fishing in terminal harvest areas in SE Alaska are under non-retention in that area if chinook salmon are not released from that THA. In areas where chinook are released, local area management biologists are imposing restrictions that mitigate any impact on wild stock. UFA supports the local and regional area management biologists' ability to address any concerns.

Additionally, not all enhanced Chinook salmon are fin clipped, making it difficult to determine whether a fish is wild or enhanced.



### Proposal 161- **Support**

UFA supports proposal 161. This proposal is necessary to comply with RFM sustainable certification. We support the amended language that is the result of ADF&G and industry work to this end.

### Proposal 163-165- **Support**

UFA supports this suite of proposals. Subsistence and personal use fisheries are reserved for Alaska residents. These are typically fully allocated fisheries and allowing guide services into these fisheries undermines the original intent of these fisheries. Subsistence and personal use fisheries have traditionally been created in a way to make harvesting easier than under sport regulations.

While UFA doesn't support the use of guides in subsistence or personal use fisheries, if in the worst case scenario the Board does approve it, we support Proposal 164 which would establish registration and reporting requirements for personal use guides and transporters. In general, UFA supports accurate catch accounting in all fisheries for best management practices.

Subsistence fishing is by definition, a customary and traditional activity. There is no custom of hiring a guide to subsistence fish. At the 2021 Prince William Sound Finfish Meeting, the BOF recognized that guiding has no place in a subsistence fishery when it adopted RC 100 which stopped the guiding of subsistence fishermen in the Glennallen subdistrict. The Board should apply that same analysis in this case and extend the prohibition to all subsistence fisheries throughout the state. Historically, subsistence fishermen have shared expenses of a subsistence trip when more than one family is participating, but paying for a guide is not an acceptable expansion of what has historically been viewed as subsistence activity. UFA supports proposal 165.

Regards,

A handwritten signature in black ink, appearing to read "Matt Alward".

Matt Alward  
President

A handwritten signature in black ink, appearing to read "Tracy Welch".

Tracy Welch  
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 153: Support  
Proposal 159: Oppose  
Proposal 160: Oppose  
Proposal 161: Support  
Proposal 163: Support  
Proposal 164: Support  
Proposal 165: Support

**Submitted by:** Ed Urbi

**Community of Residence:** North Pole, AK

**Comment:** I fish to supplement the high cost of food in the interior. I usually fish the copper River and occasionally the kenai. I use several charters due to availability. Thanks for opposing these proposals.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Alec Valdez

**Community of Residence:** Anchorage, alaska

**Comment:** Hello, I like to dipnet fish here in Alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.  
SOLOMON GULCH HATCHERY



PC504  
1 of 1

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

Alaska Dept. of Fish & Game  
Alaska Board of Fisheries  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

February 14, 2023

via email: [dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

RE: Proposal 159 – 5 AAC 39.XXX New Section

Chairman Carlson-Van Dort, Members of the Alaska Board of Fisheries:

The Valdez Fisheries Development Association Inc (VFDA) operates the Solomon Gulch Hatchery (SGH) in Port Valdez. SGH is a large production hatchery, permitted to incubate up to 270 million Pink and 2 million Coho Salmon eggs for the benefit of sport, commercial, subsistence and personal use fisheries of Prince William Sound.

**VFDA provides the following comments in opposition to Proposal 159.**

In Port Valdez, commercial fisheries targeting hatchery produced salmon are conducted in close proximity to large areas of regularly closed waters. These waters include the United States Coast Guard's permanently imposed security zone around the Alyeska Pipeline Services Company's Valdez Marine Terminal, frequently closed areas around docks and harbors and regulatory closed waters per 5 AAC 24.350 (3) v,w,x. In total, approximately 1/4 of the navigable waters in Port Valdez can be considered inaccessible to the commercial fisheries under various jurisdictions.

One solution, which has been widely acceptable to ADF&G, VFDA and the purse seine fleet for many years has been to open certain regulatory closed waters in Port Valdez by emergency order. When impacts to natural stocks are determined to be minimal, opening these additional areas maximizes the harvest of hatchery salmon, reducing fisheries congestion, ensuring quality and reducing the potential for straying. VFDA supports these measures and frequently requests these authorizations to conduct cost recovery fisheries and prosecute an effective common property fishery.

**For these reasons, VFDA opposes Proposal 159 and we ask that the Board of Fisheries take no action on this proposal.**

Thank you for your consideration.

Sincerely

Mike Wells  
Executive Director

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 159: Oppose

**Submitted by:** Michael Van Winkle

**Community of Residence:** Kenai

**Comment:** I live in Kenai and I participate in the Copper River and Kenai River dipnet fishers. I have been fishing in Alaska for more than 20 years. I fish to provide for my family. Fishing is our way of life and I take pride as Alaskan to be able to participate in these RESIDENT only fisheries, which do not compete with commercial fisheries.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I STRONGLY oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Chelsea Vanzant

**Community of Residence:** Anchorage

**Comment:** I am an Alaskan and considered myself fisherman. It is how I grew and how I recreate as an adult. I was born and raised in Alaska and have been subsisting on Alaska's wild resources my entire life, including wild Alaskan salmon. I have been fishing with my family since I could hold a dipnet and fishing rod. I fish in all

Alaskan waters including but not limited to the Copper River, the Kenai River, the Kasilof River, Prince William Sound, Resurrection Bay, Kachemak Bay, and Cook Inlet.

I OPPOSE Proposals 163-167. What these proposals are asking is unreasonable and places undue burden on Alaskan residents.

These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Personal use fisheries DO NOT compete with the commercial fishery. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. It is particularly hurtful to the thousands of Alaskan residents with disabilities who would not otherwise be able to access the personal use fisheries if not for guided services. For example, the Copper River is an extremely dangerous river and wading into the swift current or fishing from a cliff can mean the loss of life, a risk many Alaskans cannot afford.

My grandfather fished Alaskan waters for more than 40 years and fished in to his 80s and last years of life, which would not have been possible without the help of guide services. Because of the access a guide service provided to him, he was able to fish and subsist on the same fishing resources as his fellow Alaskans. Because of his disabilities and difficulty with mobility, utilizing a guide service to access his fishing grounds made it possible for him to take part in PU fisheries offered to him as an Alaskan resident. Other means of harvest can be extremely dangerous. With 8 children, this allowed him to provide for his family. By limiting access and putting a cap on harvest limits, it would have cost him tens of thousands of dollars to purchase the same amount of fish he was able to put up for the year. Furthermore, by limiting access to these fisheries, it takes away the ability to proxy a permit for elders and those with disabilities. Additionally, these proposals will create severe financial burden for those who will now have to purchase their fish or by creating hardships for those who want to participate in PU fisheries by now having to purchase their own boat.

I STRONGLY OPPOSE Proposals 163-167.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

Sincerely,

Chelsea Vanzant

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Proposal 161:

Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Helen Vanzant

**Community of Residence:** Anchorage

**Comment:** I am an Anchorage resident and have lived in Alaska more than 40 years. My children are now adults and subsistence fish on the Copper River and fish PU on the Keani River. They have been fishing with my family since they were small. It is who we are and how we identify as Alaskans: fisherman. Fishing is how we bond with our community.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries and to do so without additional burden restricting harvest limit. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit. These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit. If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose

Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Justin Vanzant

**Community of Residence:** Valdez

**Comment:** I have lived in Alaska for 40 years. I subsistence fish on the Copper River and fish PU on the Keani River. I also take part in saltwater fisheries around southcentral Alaska. I have been fishing with my grandfather and family since I was young. My first passion is fishing and my second is being a dad. A huge part of that is being able to provide for my family in a way that utilizes Alaska's wild resources and does not create a financial burden. Fishing is who I am and how I seek community.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Fishing on the Copper River is particularly dangerous, and I am not willing to risk my life. I have personally witnessed people falling into the river and people wading out too far into the current and not be able to get themselves out. IT IS DANGEROUS. Fishing from a boat provides a much safer option and helps to mitigate the risk of putting myself in harms way.

I have a wife and 4 children. Banning guided service and restricting harvest limits would impact my family immensely. It would also create a financial burden to purchase fish or to replace that resource with a different less nutrient dense food source. DO NOT TAKE AWAY MY RIGHTS AS AN ALASKAN.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Monika Vanzant

**Community of Residence:** Valdez

**Comment:** I live in Valdez with my husband and four daughters. My family fishes both the Copper River and the Kenai River personal use dipnet fisheries. Participating in these fisheries provides my family a means to supplement the high costs of living in Valdez, which is also true for many communities around the state. If these regulation change, it will be to the detriment of Alaskans. These proposals will not only effect individuals, but local businesses that cater to the Alaska fishing and tourism industry.

Proposals 163-167 will create a very burdensome financial hardship for families and restrict Alaskans from participating in the form of community they look forward to sharing every year. By restricting access, the state will take away Alaskan's rights to be able to fish in a way that is less dangerous than hanging from a cliff wall. It is the responsibility of the board of fisheries to really understand how these proposals will affect their fellow Alaskans and look at the risk of the alternatives. I do not want to see my husband or my family risk their lives.

These proposals seek to hurt Alaskans--residents who are not and do not compete with commercial fisheries. The greed of the commercial fishermen proposing these bans and restrictions will foster financial and social issues within Alaskan households. Alaskan salmon are strong and there is no legitimate concern for the conservation for these fisheries. If and when there is concern, the fishery is regulated by the Department of Fish and Game by Emergency Order. Why are the biologists at the ADFG not enough to regulate these fisheries?

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Nelson Vasquez

**Community of Residence:** Anchorage, AK

**Comment:** I am a retired, disabled veteran and love living in Alaska with my family. I fish for food for my family. I always fish in the Copper River in Chitna . I always make it a family trip with my wife, son and daughter. To not be allowed to fish would be taking away food from us. As we use this to can to store food and prepare for potential shortages. Please take away or restrict our right to fish. It's a way of life for Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:



Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:

Proposal 169:



**Submitted by:** Richard Verreydt

**Community of Residence:** Anchorage

**Comment:** I fish for my family, specifically my children who depend on my Copper River salmon as a primary source of protein in their diet, a diet strictly limited due to severe allergies to pork and other conventional protein sources. Losing this loses a critical staple in their dietary needs.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Edward Vey

**Community of Residence:** Palmer

**Comment:** I am a life-long Alaskan who grew up commercial fishing in the interior of Alaska fishing the upper Yukon drainage. We fished commercially, but also fished for our own sustenance. Over the past 40 years, I've seen the interior runs significantly decrease. When we were fishing commercially as a family growing up, we experienced downward pricing pressure along with weakening salmon numbers. As time went by, we determined that a future living lay in other endeavors and gave up the commercial element. With added hindsight, it was the correct decision. Interior Alaska runs of salmon are significantly reduced due to "at sea" factors. Consequently, in-river fishing of interior rivers has been curtailed for years w/out any significant recovery of the resource. I don't see a recovery of any significance of the once multi-million strong Yukon salmon runs any time soon. As many do, I fish south central waters for salmon for sustenance using dipnet and

sport fishing methods. These selective methods are very inefficient compared to commercial drift/set net practices . Our family depends the inefficient harvest of these fish, and our family takes time every summer to gather during the summer season, and it is a tradition for us. I've seen detrimental changes in salmon numbers in southcentral waters as well, primarily relating to King Salmon running the Kenai, Kasilof, and Copper Rivers. We all know these fish are also being adversely affected by "at-sea" factors. What those "at-sea" factors are is subject to debate, but we have a fairly good idea.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Denis Vlasov

**Community of Residence:** Anchorage

**Comment:** I'm a Russian immigrant.

I've been fishing in Alaska since 1996

Started going Dipneting after I had kids so we can have fish for a whole year and family has the nutrients that are needed and easily obtained by eating fish.

I've been going to chetna with Ryan Ford for a pass 3 years now .

I don't know why this became an issue all of the sudden but you guys should really be thinking on a bigger scale like long line boats and commercial fishing that is where the damage is and not from little people like Ryan.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Drew von Lindern

**Community of Residence:** Anchorage, AK

**Comment:** Good day. My family and I have been dipnetting for years, and we count on salmon as a dinner plate staple. We fish both the Copper and Kasilof Rivers and depend on the fish from both fisheries year-round, especially during these tough times of high inflation and rising grocery costs.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:  
Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** David Vought

**Community of Residence:** Soldotna

**Comment:** Alaska fish belong to the residents of Alaska. Most Alaskans including myself, my family and friends, depend on the fish we catch to provide us with healthy protein throughout the year. This activity goes to the character of Alaska. It is part of our life. It sustains us physically, emotionally and culturally. It is a tradition that runs through our lives that we inherit and pass on to our children. I appreciate the economic value of fish and the jobs it provides. But the economic value of fish also applies to the personal use and subsistence use of fish. The fish do not belong to the commercial permit holders. It offends me that commercial interests are attempting to reduce the access to fish for use by Alaska families to enhance their profit. I ask the Board to protect the Alaska lifestyle and values. As the saying goes, charity begin at home. Take care of Alaskans first by protecting their access to Alaska fish for personal use and subsistence purposes.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.



Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Annette Vrolyk



**Community of Residence:** Eagle River, Alaska

**Comment:** I have lived in Alaska for almost 18 years now after my family and I were lucky enough to have the military move us here. My husband has since retired and Alaska is our permanent home. He now works for the Department of Fish & Game monitoring the number of salmon returning to our great state. His scientific based observation show that personal fishing isn't the problem. He works and interacts in rural Alaskan village. He has first hand knowledge of the benefit to families of subsistence fishing. He has also shared many stories of small fishing charters that operate without impact to locals ability to successfully harvest fish for themselves. He has also shared his observations of the negative impacts of large commercial boat harvesting to the rural community. I haven't had those same experiences, but I have seen friends and neighbors sharing their harvest to help ease some of their common food struggles. We can't predict how the economy and inflation will act and in turn affect our families' abilities to provide nutrition food for ourselves and our children. We hope we can continue to be able to rely on the Alaskan streams, rivers, and other bodies of water to help ease modern day food challenges.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Erik Vuong

**Community of Residence:** Anchorage, AK

**Comment:** My family and I love fishing especially as a team effort. We love to dip net the Copper River and Kenai. Please don't let these proposed rule take away or ability to enjoy this privilege as Alaskans.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Deisha Vuong

**Community of Residence:** Anchorage, Alaska

**Comment:** I fish with my family (husband and daughter) . We are teaching our daughter to fish for herself. We teach her to take what she will eat while protecting and caring for the the environment so that it continues to produce and provide for years to come. We fish the Copper and Kenai Rivers using charters. We do not own a boat and so we rely on charters which have upheld the changing regulations issued by the state. We are able to focus on teaching our daughter how to dipnet and the safety precautions. If this was not an option we would not be able to fish as we rely on the charters and their supplies to feed our family by obtaining fish in a safe manner.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Spencer Walgamott

**Community of Residence:** Big Lake, AK

**Comment:** I dipnet in kenai to feed my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
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Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Jimmie Walker

**Community of Residence:** Eagle river

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.





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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Stan Walker

**Community of Residence:** Big Lake, Alaska

**Comment:** I grew up in Kenai and graduated in 1974. I fish because I like to eat fish. I fish all over the state, Kenai, Copper River, big Lake, willow, lake Tyone, north Slope,. I fished with AKexpeditions and Miller's River Boat Service and inlet charters. And I go myself and family. I thought the alaska constitution was setup for the residents of alaska to be able to share in the resources. And I seen more attention on commerce, more then alaska residents especially alaska natives on the river system not getting priority for the fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Robert Wallick

**Community of Residence:** Eagle River, Alaska

**Comment:** I am a 38 year Alaska resident. I fish for the enjoyment of fishing and to put food on the table. I fish with my family and friends and I enjoy taking out of state visitors fishing. Fishing allows us to not only put food on the table but gets us into the outdoors.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

I believe that the only reason for commercial fisherman to put forth these proposals is to restrict access to subsistence and personal use fisheries, thereby reducing the harvest by these users. All of this in the hope that this reduced harvest will increase the commercial allocation. In other words, it is purely and simply GREED!

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Eric Wallis

**Community of Residence:** Eagle River, Alaska

**Comment:** I fully support Proposals 163-167. I have witnessed first hand the massive abuses of Dip net fishing, especially from the military members that are stationed here and have no intention of becoming residents, but still are able to dip net after being here for a year. Many of the people who dip net park million dollar buses on

the beach and then take new four wheelers down to the water. These are NOT people who are suffering from food security! They are rich and surely do not need subsistence fishing!

Thank you for looking at this issue. This and other action are desperately needed to save salmon fishing in Alaska.

I strongly support Proposals 163-167 and ask the Board of Fisheries to VOTE YES on each of them.

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Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Thomas Wanat Ili

**Community of Residence:** Eagle River, Ak

**Comment:** I grew up in Alaska and have fished since I can remember. It is such an important time for me, my family, and my Alaskan friends. Dip netting on the Copper River is not only one of my favorite trips each summer, but also extremely important to help feed my family throughout the year. Limiting charters will undoubtedly increase the number of injuries and deaths due to people trying to navigate the river without the knowledge and experience that charter operators have. Please do not consider banning this for Alaska Residents!!!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Audrey Ward

**Community of Residence:** Wasilla, AK

**Comment:** I depend on dip netting to provide fish for my family which I cannot afford to buy if I went to the store. I also give a lot of my fish to the elders who cannot fish for themselves. Please let us continue this tradition. I am AK Native and unable to go back to my village to fish, so this is an important resource for me.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Cher Ward

**Community of Residence:** Willow

**Comment:** Myself and my family and friends have done dipnetting together at Kenai for 30 years. I totally rely on this source for food all year! The sockeye salmon we bring home every summer is vital to our yearly subsistence food source!

The resources of Alaska belongs to the Alaskan residents - NOT to out of state and foreign commercial fishing boats !!!

The board of fisheries job is FIRST to protect the Alaskan resources (salmon) for Alaska residents!

It is NOT resident and sports fishermen who have raped & destroyed the King Salmon stock and you know that the commercial boats are responsible ! Bycatch - and not all bycatch is reported and policed.

ALL of the MatSu streams no longer have adequate salmon returns for local residents and we all know that the commercial boats pick up our salmon schools before they can get near their destination streams ! Therefore, our last hope/source is dipnetting at the Kenai, Kasilof, Copper Rivers and Fish Creek !

With almost no salmon locally - we must travel LONG distances, take time off from work, to get salmon for our year long supply of this vitally important food. Now, consider the price of fuel to drive!

Those of us who do not have a boat MUST rely on personal use dipnetting!

Already other sources of wild food harvesting have been destroyed by "development & progress" with no concern for local residents who rely on those sources.

The board of fisheries job is first to protect the Alaskan resources for Alaska residents!

Everyone is aware that "money is power" and that is what the "not Alaskan" commercial evils use for power over individual Alaskan residents - families! Please protect us !

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose  
Proposal 165: Oppose

Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Aaron We erson

**Community of Residence:** Petersburg, Alaska

**Comment:** It would be great to be able to fish Bristol bay and seine salmon elsewhere in the state afterward without having to put a permit in someone else's name. Propositions 157-158 would simplify life for many Alaskan salmon fisherman who fish multiple areas. I don't see the downside. Thankyou!

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157: Support  
Proposal 158: Support  
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Proposal 166:  
Proposal 167:  
Proposal 168:  
Proposal 169:



**Submitted by:** William Webb

**Community of Residence:** Kasilof, Alaska

**Comment:** I guided in the Kenai River from 1987 to 1997. I quit guiding because I could see the rapid demise of king salmon in the River. At that time I believed the Kenai was being managed primarily for the enhancement of red salmon. I believe it (the demise) was because of over sport fishing in the River, and the mismanagement of commercial fishing in Cook Inlet and Alaska and International waters.

Recently I've fished only silver salmon in the Kenai and it seems that fishery may be in decline.

I kind of think under-regulation in ALL user groups will eventually ruin this wonderful resource I remember from the past.

In regard to dipping in the Kenai...don't allow a fishery unless you can, or are willing to, enforce the laws and regulation of that fishery. I have seen constant violations and no effort to enforce the regulations. I participated in dipnetting for the first few years and could see that situation beginning to be abused...so I quit doing that too.

The management of our fish resource is not working. Our rivers eventually will be like the rivers up and down the western United States.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Phillip Weidner

**Community of Residence:** Anchorage, Alaska

**Comment:** I am a lifelong Alaskan who depends on my families PU fish that we harvest on the Copper River.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious. I feel this is a greedy grab for a resource that belongs to all of the residents of our state not just those who economically benefit from it.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Troy Weiss

**Community of Residence:** Anchorage, AK

**Comment:** I am a sport and subsistence fisherman. Alaskans fishermen should have full access to feed our families and enjoy the fish that bless our great state of Alaska. Commercial fishermen should be more regulated especially on by-catch. Once the catch/net/kill an allotment of marketable fish they should be done. No killing fish and dumping them as by-catch. Here is where the King Salmon have gone. Just watch the commercial guys off Ketchikan.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**



**Submitted by:** Rebecca Wells

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

If 163 & 165 pass I will no longer be able to access these fisheries as I am unable to wade into the rivers and ocean to dipnet and am not able to share this experience with my children and grandchildren. It has been our tradition participate in the harvest and I take pride in my ability to be a provider.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** Scott Wells

**Community of Residence:** Palmer, Alaska have

**Comment:** I go to the Copper River and Fish Creek.

Fish is a main portion of my diet year around. And I proxy for people who can't get out and get fish. So I am supplying others for their needs also.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 12:</b>	<b>Proposal 157:</b>	<b>Proposal 165:</b> Oppose
<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Mark Welty



**Community of Residence:** Anchorage Alaska

**Comment:** I oppose the ban on proposal numbers 163-168, keeping in mind that the fish and game that live and move throughout the state of Alaska belongs to the people of Alaska, and not Outside interests( out of state commercial fishing companies, trawlers, out of state rack and head hunters, outside mining companies...

The practise of dip netting allows all Alaska residents the opportunity to harvest enough fish for the season and helps with the high cost of living.

Many Alaskans live below or close to the poverty level and any subsistence rights help feed Alaskans.

Dip netting allows families and friends to gather on the occasions for fun and adventure in the Alaskan outdoors.

We need to keep this option available for all Alaska residents

Mark Welty

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b> Oppose
<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Chad Wemple



## **Community of Residence: Wasilla**

**Comment:** Any restriction on Alaska residents personal subsistence and dip netting fisheries is an assault on every Alaskan resident!

Restrictions should come for those first who are profiting. Restricting Commercial Fisheries for profit prior to people who are trying to put fish on their table to eat healthy and live a sustainable lifestyle.

You mess with our food and you will be awakening a sleeping giant. The residents of Alaska have had enough abuse by a government that is supposed to protect its residents.

These interests by in large are out of state big money and y'all better take note because this one we're watching. We're done having our Pfd stolen and you can bet any person voting to line the pockets of out-of-state greedy corporate fishing companies over residents putting food on our tables is a transgression we will not allowed to happen and you can bet if you vote for this your political career will be finished!!!!

I dip net and set net to feed my three teenage boys.

Any restriction put on the people who live in Alaska to feed their family salmon and instead to the benefit of commercial fish corps from out of state is not Alaskan. Anybody who votes for this kind of theft can consider their political career over!!!!

Alaskan's will not stand for this!!!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Don Weston

**Community of Residence:** Anchorage, Alaska

**Comment:** Losing our land more and more just because they wanna play hero

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Benjamin Westveer

**Community of Residence:** Chugiak

**Comment:** I fish for enjoyment and to feed my family. I fishing across south central alaska.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Rick Whitbeck

**Community of Residence:** Anchorage

**Comment:** As a Kenai River landowner, my family and I fish the River year-round. It feeds our family, like so many others. We are all born-and-raised Alaskans, who understand the need to continue to protect fish runs for future generations.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a



statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
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<b>Proposal 153:</b>	<b>Proposal 161:</b>	<b>Proposal 169:</b>
<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Linzey White

**Community of Residence:** Kenai, Alaska

**Comment:** I am a single mom who fishes the Kenai river to help fill my freezer for the winter.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
<b>Proposal 82:</b>	<b>Proposal 159:</b>	<b>Proposal 167:</b> Oppose
<b>Proposal 87:</b>	<b>Proposal 160:</b>	<b>Proposal 168:</b>
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<b>Proposal 154:</b>	<b>Proposal 162:</b>	
<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

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**Submitted by:** Larry Whitte

**Community of Residence:** KENAI, AK



**Comment:** My self and my wife fish all over the state mainly Kenai river my grandson is 7 and loves to fish with his grandpa along with his mother and my wife we dip net and my grandson loves to catch and release the pinks.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Christine Wilcox

**Community of Residence:** Anchorage, AK

**Comment:** We feed our family by dipnetting salmon. We fish with family and friends to feed ourselves. We fish both the Copper and the Kenai depending on runs of fish and timing with work. The fish are essential.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose  
Proposal 164: Oppose

Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Teresa Wilkie

**Community of Residence:** Anchorage

**Comment:** I am born and raised in Alaska and this is ludicrous that the industry wants to take this away from Alaskans who rely on the fish for all. We all coexisted before but now Greed has taken over, it's a Sad day if this Ever goes through. God Help us All 🙏🙏

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 12:  
Proposal 13:  
Proposal 82:  
Proposal 87:  
Proposal 153:  
Proposal 154:  
Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Lee Wilkins



## **Community of Residence:** Clam Gulch

**Comment:** Alaska's fish, for Alaskans, in Alaska! Alaskans come first and should control access to commercial fishing, not the other way around.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Kathleen Williams

## **Community of Residence:** Anchorage

**Comment:** I moved to Alaska 25 years ago and for the better part of that time the Commercial Fishers have successfully impinged, impeded, infringed, restricted, and, in some cases, have banned our ability to fish. It is time for this to stop. Moreover, the restrictions on Sportsman fishing (as far as limits) need to be relaxed.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Douglas Williams

**Community of Residence:** Anchorage

**Comment:** I fish because it is an affordable way for me to maintain a healthy heart. I fish the Chitna because of my work schedule.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 11:	Proposal 156:	Proposal 164: Oppose
Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** John Williams

**Community of Residence:** Cordova, AK

**Comment:** Support Proposal 167

It is imperative that all user groups report catch to ADGF in a timely manor, So that ADFG can better manage the fisheries.

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<b>Proposal 11:</b>	<b>Proposal 156:</b> Support	<b>Proposal 164:</b> Support
<b>Proposal 12:</b>	<b>Proposal 157:</b> Support	<b>Proposal 165:</b> Support
<b>Proposal 13:</b>	<b>Proposal 158:</b> Support	<b>Proposal 166:</b> Support
<b>Proposal 82:</b>	<b>Proposal 159:</b> Oppose	<b>Proposal 167:</b> Support
<b>Proposal 87:</b>	<b>Proposal 160:</b> Oppose	<b>Proposal 168:</b> Oppose
<b>Proposal 153:</b> Support	<b>Proposal 161:</b> Support	<b>Proposal 169:</b> Support
<b>Proposal 154:</b> Oppose	<b>Proposal 162:</b>	
<b>Proposal 155:</b> Support	<b>Proposal 163:</b> Support	

**Submitted by:** Travis Williamson

**Community of Residence:** Anchorage, AK

**Comment:** I have utilized a guide to fish for my families copper river salmon for the better part of a decade. I do not own a boat and do not want to risk my life or the lives of my family members fishing from the banks/rocks of the Copper River. Securing a charter has allowed me to not only feed my family, but do it in a safe manner. Continuing to allow guided fishing charters on rivers like the Copper also keeps the amount of boat traffic down. This reduces the amount of fuel and overall traffic to and from rivers during the busy fishing season. I see no reason why the SOA should limit the continued use of guided charters on these fisheries. We cannot continue to allow big business commercial fisherman to continue to try and snuff out the little guys. The little Alaskan guys who depend on these charters to feed their families.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

I support the Board of Fisheries maintaining the status quo regarding personal use and subsistence fisheries. Continue to allow guided charters. Do not increase harvest report requirements. Do not restrict harvest limits by implementing a statewide limit.

Passage of these proposals would remove the right for residents to access these fisheries by banning their ability to secure guided charter access. Proposal 166 creates a statewide bag limit which significantly reduces my harvest opportunity. Additionally, passage of Proposals 164 and 167 create new harvest reporting requirements beyond what has historically been effective and necessary.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder.

Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Paul Winn

**Community of Residence:** 4006 Lois Drive Anchorage, AK 99517

**Comment:** I have dipnetted on the Kenai River most of my life. It is essential to my family every year. I think this resource should be viewed as state resource. This state resource should be prioritized to personal use. Restricting personal use in favor of commercial use is a error.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Matthew Winn

**Community of Residence:** Wasilla

**Comment:** Without our ability to subsist here in Alaska, defeats the purpose to even live here. We depend on the fish that we catch at Kasilof in Kenai in the copper river. Taking away our God-given right to subsist and feed our families is a direct assault on we the people by you our tyrannical government. How dare you!

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 155:

Proposal 156:  
Proposal 157:  
Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Victoria Winn

**Community of Residence:** Wasilla, Alaska

**Comment:** Me and my family live from dip netting. We fish and save for the rough winters. We are not rich to go and buy salmon.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

As an Alaskan, I have a right to access personal use and subsistence fisheries. Do not limit my ability to access these fisheries, require unnecessary reporting, or establish a statewide bag limit.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	



**Submitted by:** Grant Wisniewski

**Community of Residence:** Kenai, Alaska

**Comment:** I participate in the Dip Net season like everyone does every year. I enjoy the 21 days of catching fish and filling the freezer for the winter. The fish go to families that depend on it for the winter and summer. Even if you are not catching fish its a family fun event that is enjoyed by all. If they are thinking of taking this away from the Alaska people, your focus should be 100% on the millions of pounds of bycatch wasted weekly and monthly and seasonally with no repercussion's vs worrying about the dip netters.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 12:	Proposal 157:	Proposal 165: Oppose
Proposal 13:	Proposal 158:	Proposal 166: Oppose
Proposal 82:	Proposal 159:	Proposal 167: Oppose
Proposal 87:	Proposal 160:	Proposal 168:
Proposal 153:	Proposal 161:	Proposal 169:
Proposal 154:	Proposal 162:	
Proposal 155:	Proposal 163: Oppose	

**Submitted by:** Rick Witters

**Community of Residence:** Bonney Lake, Washington (part time in Yakutat AK),

**Comment:** Commercial interests should not outweigh Alaskans way of life and the opportunity to subsistence fish for food. This is a way of life for Alaskans and should never be taken away.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Most of these proposals are an attack on Alaska's most vulnerable residents. Ease of access to personal use and subsistence fisheries should not be further restricted in any way.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

**Submitted by:** Roy Wollgast

**Community of Residence:** Anchorage, ak

**Comment:** I am a veteran and current member of the Alaska air national guard. I strongly oppose any restrictions to residents or their ability to put food on the table for their families.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Implementing new reporting requirements only serves to discourage participation and increases administrative costs.



These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Dennis Wood



**Community of Residence:** Anchorage

**Comment:** I have been fishing in Alaska for 44 years, both sport all around Alaska and personal use on the Copper River and the Kenai River. I fish with friends and share my fish with my family and some friends also who do not get to fish. I cannot believe that the commercial fishermen in their greed are trying to limit the individual Alaskans' harvest again.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.

The Proposal 166 establishing a statewide finfish bag limit, potentially reducing household harvest limits.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:



**Submitted by:** Robert Wrobel

**Community of Residence:** fairbanks, alaska

**Comment:** I have utilized the cooper river to harvest my annual salmon harvest as a personal use fishery since the 80's. This stock provides me with healthy and quality food and decreases my capital expenditure in my household budget. Have you seen the grocery prices, especially salmon? I do not use a guide but witness a vibrant guide transport service for many who are unwilling or unable to access a fishing spot from shore. Is not capitalism a good thing for the Alaska economy? Do they not provide a service for those willing to pay?

I do see downsides though. As this fishery has grown, between the increased fisherman and the ability of them to utilize a transportation service it has become a rather combat style fishery with echos of the Russian/Kenai River for fishing spots. I have also personally witnessed low grade grousing between the guide services operating out of O'brien Creek.

I realize commercial fisheries are a major input into Alaska's economy. I have worked the slime line and worked the product from tote to flash frozen. I also see the dominance of out of state concerns capitalizing this industry. How many permit holders, processing plants, and tenders are Alaska residents and how many are in Alaska only for the fishery or long enough to qualify as an Alaska resident (i.e. PFD). I worked in Iliamna at fishing lodge and all the fishing guides, pilots , and most of the staff were not Alaska residents. Same goes for hunting guides. Up for the season then back south. Starting to sound like territorial days again.

Fortunately, not like the Yukon, the Cooper River does not have a large amount of folks in villages along the way depending on this, to them an essential resource and therefore the increased harvest is not so destructive. Instead the river feeds communities along the Alaska highway system for those subsistence and personal use permit holders.

I believe ocean-based commercial fisheries already get their share and are more likely to harm/deplete (see by-catch and falling king salmon and crab stocks for examples) the resource than any other users and any government regulation picking one concern over another for profit is wrong.

Therefore:

- No to more regulations promoting ocean-based commercial use over personal use and guide/transport services.
- Review residency versus non-resident in fishery use to get a good idea of the ratio and by that assess money leaving the state.
- I disagree with allowing a personal use permit holder from one fishery to access another area. For example AKFG requires those hunters wishing to hunt in the Glennallen area (I don't remember the hunt area or permit number) are not allowed to take big game from other areas. This protects the resource and the local hunter usage. Choose between the two major dip-net fisheries, the Kenai and the Cooper. This would alleviate some of the crowding that is becoming increasing common. Commercial permits holders is another story and should be allowed to harvest in areas that they have permits.

Lastly, there isn't a thing much better than sitting on a bank watching the river flotsam go by, the sound of eagles and seagulls, sun in the sky, the swirl of the river itself and the silt of the land. I hope to always have that opportunity until death takes me.

TNX

I OPPOSE Proposals 163 or allow alternative 3 or 4. I oppose 164 and 167. I think there is merit to Proposals 165 and 166. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

If Proposals 163 or 165 are passed, Alaskans with limited mobility would essentially be excluded from participating in these fisheries.

Proposal 163 & 165 bans charters which provide a safe means of access for Alaskans, some of which are not physically able or do not own a boat or fishwheel. Furthermore, Proposals 164 and 167 create additional reporting requirements which I do not support. Proposal 166 could potentially limit residents' ability to feed their families by implementing a new statewide finfish bag limit. There is no conservation argument for a statewide limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

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Proposal 156:  
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Proposal 158:  
Proposal 159:  
Proposal 160:  
Proposal 161:  
Proposal 162:  
Proposal 163: Oppose

Proposal 164: Oppose  
Proposal 165: Oppose  
Proposal 166: Oppose  
Proposal 167: Oppose  
Proposal 168:  
Proposal 169:

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**Submitted by:** Ariana Yambaw

**Community of Residence:** Wasilla, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Charters provide safe and reliable means for Alaskans to participate in these fisheries. Without them, we do not have the means of access to harvest our fish for the year. I choose not to stand in heavy current, hang from a cliff wall or attempt wade in the surf to catch fish.



Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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<b>Proposal 13:</b>	<b>Proposal 158:</b>	<b>Proposal 166:</b> Oppose
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<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Mike Yliniemi

**Community of Residence:** Wasilla, AK

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Charters provide safe and reliable means for my family to participate in these fisheries; without them we do not have the means of access to harvest fish. Proposals 164 and 167 require new reporting requirements which only succeeds in creating additional data management challenges.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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**Proposal 166:** Oppose  
**Proposal 167:** Oppose

**Proposal 168:**  
**Proposal 169:**



**ALASKA BOARD OF FISHERIES**

**STATEWIDE FINFISH MEETING**

**MARCH 2023**

**ANCHORAGE, AK**

**PROPOSAL SYNOPSIS, COMMENTS AND RECOMMENDATION**

**SUBMITTED BY**

**YUKON DELTA FISHERIES DEVELOPMENT ASSOCIATION (YDFDA)**

**February 26, 2022**



# STATEWIDE FINFISH PROPOSALS

## 19 Proposals

### [View PDF of All proposals for Statewide Finfish](#)

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  - [All proposals for Gear/Methods and Means](#) (PDF 166 kB)
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- **Postponed from Bristol Bay** Nushagak-Mulchatna King Salmon Management Plan — [View PDF of all proposals for Postponed from Bristol Bay Nushagak-Mulchatna King Salmon Management Plan](#)| Show Proposals



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## Gear Methods and Means (6 proposals)

### **PROPOSAL 87**

#### **5 AAC 39.105. Types of legal gear.**

**PROPOSED BY:** Alaska Department of Fish and Game

**Purpose:** Define eel stick

**What would be the effect if this proposal were adopted?** *Eel sticks would become allowable legal fishing gear for subsistence and would be recognized as a commercial fishing gear type for lamprey. It is unlikely that eel sticks will substantially change the quantity of lamprey harvested.*

#### **Rationale by Proponent:**

- This would add eel sticks as a legal gear for commercial and subsistence fishing.
- An additional department proposal was submitted to add this as a legal gear type for subsistence fishing.
- The commercial fishery for Arctic lamprey (eels) operates under a commissioner's permit that allows commercial permit holders to use dip nets and eel sticks; however the eel stick is not included in regulations.
- Statewide provisions (5 AAC 01.010 (1)) for subsistence gear would refer to and include this addition.
- Eel sticks are traditionally used in Districts 2, 3 and 4 for harvesting Arctic lamprey for commercial and subsistence purposes through the ice.
- Eel sticks are described in Subsistence Division Technical Paper No. 289 (<http://www.adfg.alaska.gov/techpap/tp289.pdf>)
- on management plans for chum and king salmon; however, the department would like the ability to use these live-release gears for all salmon species to harvest abundant salmon species that have overlapping run timings.
- Stating conservation gear regulations in this commercial section simplifies the regulations and will allow for a more adaptive management strategy benefitting commercial users.

#### **ADF&G RECOMMENDATION: SUPPORT**

*The department submitted and SUPPORTS this proposal to be consistent with current and traditional fishery practices and to provide for social and economic benefits that might otherwise be forgone.*

#### **YDFDA RECOMMENDATION: SUPPORT**

\*\*\*\*\*





## **PROPOSAL 82**

### **5 AAC 39.250. Gillnet specifications and operations.**

**PROPOSED BY:** Alaska Department of Fish and Game

**PURPOSE:** Modify the dates sinking of gillnets is allowed in the Yukon Area from October 1 to April 30

**What would be the effect if this proposal were adopted?** *This would require gillnets to have visible float line and floats on the surface of the water in the Yukon Area between May 1 and September 30 for subsistence, personal use, and commercial fishing.*

#### **Rationale by Proponent:**

- This proposal would modify the dates when gillnets are allowed to be fished without the float line on the surface of the water in the Yukon Area.
- During salmon seasons, from May 1 to September 30, the float line and floats must be floating on the surface.
- Submerged gillnets are less visible and may be difficult to observe if fishing illegally during closed periods.
- Allowing a gillnet to be in a fishing condition with floats not visible on the surface of the water is a navigation hazard.

#### **ADF&G RECOMMENDATION: SUPPORT.**

*In the Yukon Area, float lines and floats that are visible on the water surface between May 1 and September 30 are beneficial for boater safety, salmon stock management, and enforcement. Fully submerged gillnets will still be allowed during winter fisheries*

#### **YDFDA RECOMMENDATION: SUPPORT WITH MODIFICATIONS FOR DISTRICTS 1 AND 2 ONLY.**

\*\*\*\*\*



## Personal Use/Subsistence Limits and (2 proposals)

### **Proposal 167**

#### **5 AAC 01.015. Subsistence fishing permits and reports.**

#### **5 AAC 77.015. Personal use fishing permits and reports and display of personal use fish.**

**PROPOSED BY:** Cordova District Fishermen United

**Purpose:** Require inseason reporting of subsistence and personal use salmon harvest within 5 days of harvest, as follows:

- (6) subsistence fishing reports must be completed on forms provided by the department and submitted to the department office from which the permit was issued [at a time specified by the department] within 5 days of harvest for each particular area and fishery;  
...
- (6) personal use fishing reports must be completed on forms provided by the department and submitted to the department office from which the permit was issued [at a time specified by the department] within 5 days of harvest for each particular area and fishery

**What would be the effect if this proposal were adopted? ADF&G:** *Require harvest reporting by participants in subsistence and personal use salmon fisheries within 5 days of harvest.*

#### **Rationale by Proponent:**

- Require In-Season reporting of Subsistence and Personal Use Salmon within 5 days of harvest using an online app or phone call to the Department.
- Currently, participants in both fisheries are not required to report their harvest until well after the close of the season.
- Both Fisheries take a substantial number of salmon, especially in low abundance runs.
- It is imperative that managers have real time data to use their EO authority to close fisheries when the security of the resource demands it.
- The Department has been consistent at Area meetings saying this is a Statewide issue.
- It is time for all users of the valuable resources to be accountable.

#### **ADF&G RECOMMENDATION: OPPOSE**

*The department OPPOSES this proposal. A regulatory requirement of mandatory reporting within 5 days of harvest for personal use and subsistence fisheries is unnecessary. The department already has the authority under 5 AAC 01.015 and 5 AAC 77.015 to require this level of reporting in areas where subsistence and personal use fishing permits are issued. The*



*department currently does not require this frequent of reporting for inseason management. An additional burden would be placed on users, the requirement would be challenging to enforce, and this would place significant additional budgetary and administrative burdens on the department.*

#### **YDFDA RECOMMENDATION: OPPOSE**

The subsistence section of this proposal should not be a statewide issue because of the varying need for the intensity of the management of subsistence fisheries throughout the state.

Subsistence fishing regulations should be tailored to the specific area, taking in consideration the size of the resource, Amounts Necessary for Subsistence, access to the resource, the amount and quality of the inseason run information, and the size of the population of subsistence users. In some areas, subsistence management may need to be highly regulated with issuance of permits, fish limits, rigidly scheduled time for subsistence fishing, and mandatory inseason reporting requirements. Contrastingly, in the AYK Region, harvesting wild resources for food is a way of life for most residents. There are few areas where subsistence permits are required; there are no limits on the number of fish harvested; subsistence fishing time is generous; and reporting is voluntary through post-season subsistence surveys.

In the AYK Region, there is no need for inseason reporting because resource managers know that subsistence is the priority consumptive use and the number harvested is relatively constant from year to year when runs are good. Managers realize that the people rely on subsistence for sustenance and food security. Additionally, salmon management plans are specifically designed to allow commercial fishing only when the projected run size is adequate to provide for escapement requirements and subsistence needs. In fact, many AYK salmon management plans contain a buffer for subsistence harvest so that more than enough fish enter the river to satisfy subsistence needs before commercial fishing is allowed. Further, where and when subsistence permits with fish limits are required, additional permits are usually issued upon request. Recently, managers have restricted or closed subsistence fishing because of critically low runs. The people, who are good stewards of the resource, have complied with these restrictions and closures to protect the resource.

Although most AYK Region subsistence fishing occurs in conjunction with salmon runs, subsistence fishing for other fish species occurs during other times of the year. AYK subsistence fishers do not fish a few days for salmon and then quit for the season. Harvesting wild resources for food is an ongoing, never ending, lifestyle. Throughout the Yukon Area, subsistence fishing starts in the spring either under the ice or after ice out for shee fish and smelt. Pacific herring are also harvested along the coast. Kings are harvested for human consumption after ice out. Harvests continue for summer and fall Chum and Coho salmon throughout the ice-free months for either human consumption or to feed dogs. Saltwater fish and are also taken during ice-free months. In the fall, cisco, white fish, and lamprey are harvested. In the winter, subsistence fishermen fish under or through the ice for burbot, shee fish, char, and northern pike. In the Kuskokwim Area, in addition to king salmon, Chum, Sockeye, and Coho salmon are also fished during in the ice-free months.

Large subsistence fisheries in the AYK Region have been ongoing for millennium. Additionally, harvesting wild resources for food contains a spiritual aspect for many people. Adding further



restrictions on this customary, time-honored, and spiritual tradition is unwarranted and counterproductive to the wise management of the resources. Additionally, unnecessary restrictions insult the people who have a long history living the subsistence lifestyle and caring for the resources. There is no need for permits, limits, and inseason reporting. Managers do not need these data to manage the fish resources. The subsistence harvest is the priority consumptive use, The large number of fish harvested in these very large subsistence fisheries is considered by managers before the first salmon enters the river. Usually, AYK subsistence fisheries occur with little management while the commercial fisheries are more intensively managed. Accordingly, YDFDA is OPPOSED to the subsistence restrictions proposed in this proposal.

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Proposal 82: Support With Amendments

Proposal 87: Support

Proposal 167: Oppose

**Submitted by:** Willie Zamora

**Community of Residence:** Anchorage

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

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**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

**Submitted by:** Michael Zamzow

**Community of Residence:** Anchor Point

**Comment:** I have a private boat that I take family and friends fishing for halibut out in Cook Inlet out of Anchor Point for halibut. I dipnet for my 25 reds on the Kenai for our family that enjoy the salmon in Anchorage and Barrow, we also enjoy sport fishing for the reds on fly rods for the excitement and thrill of reeling in the fish.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a

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<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	



**Submitted by:** Tom Zarrilli

**Community of Residence:** Talkeetna, AK

**Comment:** I fish to eat. Copper river

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These proposals are an attack on Alaska residents. I support maintaining my right to hire a guided charter.

With limited access or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable access.

These proposals threaten Alaskan's rights to access personal use and subsistence fisheries. Specifically, there is no valid argument to prohibiting guided charters, or adding new reporting requirements, or inventing a statewide bag limit.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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<b>Proposal 155:</b>	<b>Proposal 163:</b> Oppose	

**Submitted by:** Jonathan Zeppa

**Community of Residence:** Wasilla, AK

**Comment:** Proposals that restrict residents use of Fish and game resources are counter to rights explicitly laid out in the Alaska Constitution. Not sure when/how Commercial use of fish and game resources began to supplant the constitutional rights of residents but I see it in many management practices these days.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

There is not a conservation concern for the personal use and subsistence finfish fisheries in Southcentral Alaska and banning guided access statewide is effectively banning Alaskans' right to reasonable and safe access. Proposals creating multiple harvest reports are excessive.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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**Proposal 169:**

**Submitted by:** Anthony Zielinski

**Community of Residence:** Eagle River

**Comment:** I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.



The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

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**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**

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**Submitted by:** William Zollinger



**Community of Residence:** Anchorage

**Comment:** I have been fishing in Alaska since 1994. Worked my first summer job in Alaska off loading commercial fishing boats at the mouth of the river watching people Dipnet. I have continued to sport fish and raise my family eating wild caught salmon throughout the state. I enjoy all aspects of sport and subsistence use fishing in Alaska with my family.

I OPPOSE Proposals 163-167. These five proposals come from commercial fishermen who fish in the Copper River District and Prince William Sound who want to substantially restrict or ban Alaskans opportunity and access to personal use and subsistence fisheries. Alaska struggles with food insecurity and proposing hurdles and prohibiting safe access is unnecessary and quite frankly, malicious.

Passing 163 & 165 would prohibit our friends, families, and neighbors who are not physically able to wade into the current from hiring the safety and comfort of a charter boat.

These five proposals substantially alter the way many Alaskans feed their families. With limited access and/or overcrowding along the riverbanks, chartered access allows my family to participate in personal use and subsistence fisheries where we would otherwise not have reasonable or safe access.

The Copper & Kenai Rivers are historically dangerous to wade in and operate a private boat. Guides have expert knowledge of local conditions that make it safer for Alaskans to access this fishery.

Proposals like 163 & 165 threaten rights of Alaskans and are the first step in a slippery slope to unequitable access to a resource. Proposal 164 simply duplicates the harvest data reported post-season by the permit holder. Additionally, Proposal 167 only creates unnecessary reporting burdens. Finally, Proposal 166 would create a statewide bag limit which chips away at the extremely small allocation of salmon Alaskan residents have compared to commercial fishermen.

I strongly oppose Proposals 163-167 and ask the Board of Fisheries to VOTE NO on each of them.

*Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*



**Proposal 11:**  
**Proposal 12:**  
**Proposal 13:**  
**Proposal 82:**  
**Proposal 87:**  
**Proposal 153:**  
**Proposal 154:**  
**Proposal 155:**

**Proposal 156:**  
**Proposal 157:**  
**Proposal 158:**  
**Proposal 159:**  
**Proposal 160:**  
**Proposal 161:**  
**Proposal 162:**  
**Proposal 163:** Oppose

**Proposal 164:** Oppose  
**Proposal 165:** Oppose  
**Proposal 166:** Oppose  
**Proposal 167:** Oppose  
**Proposal 168:**  
**Proposal 169:**