
ALASKA BOARD OF FISHERIES

Kodiak Finfish Meeting

Kodiak | January 9-12, 2024

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Dear Board of Fisheries Members,

My name is Virginia Adams. I have been a commercial fisherman all my working life. I have fished in several fisheries in Kodiak, Alaska but will comment here only about the Kodiak commercial salmon fishery. I have been a west side setnet fisherman since 1980, owning and operating my families setnet site "Valley Pt" in Viokoda Bay for 44 seasons.

It is my sincere hope that you members of the Board of Fisheries will take careful and deliberate consideration of the proposals put forth by Northwest Kodiak Setnetters Assoc (NWSA), # 62,64,70 and 71. These proposals aim to curtail and even possibly alter the steady decline and maintain the sustainability of the west side set net fishery in Kodiak. Without decisive action by the Board of Fisheries we can be assured of the eradication of this historic and, to me, beautiful fishery. I have worked on the graphs, data and in-depth explanations you will receive as Board members from NWSA so I will refrain from lengthy in depth writing here regarding NWSA proposals. As previously stated, it is my hope that you will look deeply at the information offered to you relative to these important issues and subsequent determinations.

In reference to Proposals # 66,72,73 and 74 put forward by seiners and the Kodiak Seiners Assoc, I strongly oppose these proposals. At a time when set netters are fighting for the ability to survive, seiners find it time to advocate for expanding their opportunities on the North and South boundary of the Central Section where set netters and seiners fish together (Prop # 72&73). To increase opportunity in these seine only areas directly adjacent to the combined setnet seine Central Section will only undoubtedly decrease setnet opportunity. Prop #74 is even more draconian in its attempt to split the Central Section into 3 separate management areas so seiners can concentrate efforts in 1 section while other sections remain closed where set netters fish. Any 1 section being open while others are closed will also concentrate seiners in that section reducing or eliminating set net opportunity at that time due to increased seine pressure.

West side set netters are looking for increased opportunity to survive. Ideally set netters would like to see time with set nets in the water fishing while seine effort is not present. It is critical to understand that seiners have the entire Kodiak Island and parts of the Mainland to fish, over 50 Sections. West side set netters are confined to the Central Section.

It is my belief that only the members of the Board of Fisheries will be able to prevent the impending loss of the Kodiak west side set net fishery. Prioritizing the harvest of traveling salmon through the Central Section by set net and seine and deter the increasing harvest in terminal areas by seine alone, is fundamental to our survival as set netters. NWSA has put forth proposals that attempt to hopefully begin that process. Please help us to preserve this historic Kodiak fishery.

Respectfully,

Virginia Adams



Submitted by: Grace Allan

Community of Residence: Kodiak, Alaska

Comment:

I am a local fisherman who has been involved in the Kodiak salmon and groundfish fisheries for the last 15 years. I am working on buying my own seine boat to support myself and contribute to our local community economy. Some of these proposals make it much harder for young fishermen entering into our local industry to succeed which is detrimental to our state fishery overall.

I oppose proposal 54 and support proposal 55, the intent of proposal 55 is to give adf&g a definite rollover threshold, while proposal 54 is doing the same but trying to take jig cod quota away from the jig fishermen at the same time. Cod jigging is one of the last low cost entry fishery for small boats. We should be trying to support low cost entry fisheries as a way to encourage a diverse marine economy, not reallocating that quota to higher entry cost/larger boat pot fishery. Let's be cautious and start with the lower rollover threshold of 10% and increase it later on at future BOF if needed.

I support proposals 56 and 57. As a herring gill net permit owner we need to diversify our herring markets and seasons as much as possible since the roe fishery has become less and less profitable.

I oppose proposals 62 and 70. If setnet salmon allocations need to change let's do it in a manageable way. The mixed-stock, multispecies, non-terminal nature of the setnet fishery makes it impossible to effectively allocate to their gear type. This is why there is no allocative plan in the state that allocates harvest to setnet gear types outside of terminal harvest locations. These proposals scare me away from investing more into my seining operation if large swaths of my fishing time and possible catch can be taken away to favor a gear type that seems unable to realistically harvest what they are asking for.

I support Proposal 66, it just makes sense that we follow the rest of the state and do away with antiquated gear regulations that don't apply in the way they were originally meant anymore.

I support proposal 74, this proposal enables the state to tailor management to specific salmon runs. If the department is on board with this change I see only positive ramifications for our fish stocks.

Proposal 54: Oppose

Proposal 55: Support

Proposal 60: Support

Proposal 62: Oppose

Proposal 66: Support

Proposal 70: Oppose

Proposal 74: Support



Dear Board of Fish Members,

My family has been harvesting and processing salmon in Uganik Bay, Kodiak Island since 1944. My father in law worked the salmon traps, then worked a seine boat and ultimately became the cannery superintendent for many years. I ran the local setnet tender "Flying Tiger" in the early 70s. My wife worked in the cannery packing eggs and serving food in the mess hall. She has spent every summer of her life in Uganik Bay. We met there in 1969. After we graduated from college, we made the decision to buy a setnet site and raise our children in Uganik Bay. Fishing salmon and hand lining halibut from our Gull Light Setnet cabins in Uganik. When the kids graduated high school, we bought another site and permit to help put them through college.

The Kodiak Setnet fishery could be the last viable small boat fishery in the country. Over the past 10 years we have witnessed firsthand the reallocation of salmon away from set netters into the hands of the seine fleet. We're in danger of losing our way of life because of the changes in fisheries management and increases in seine boat size and gear efficiency.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Set netters Association. Set netters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Robert, Tyler, Ashley, and Christy Allen



December 26th, 2023
Matthew Alward
60082 Clarice Way
Homer, AK 99603

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Opposition to proposals 62, 69, and 70

Dear Chairman Wood and Board of Fisheries members,

I am a commercial fisherman living in Homer, AK who has operated my own vessel in the Kodiak salmon seine fishery since 2008 with Larsen Bay as my base of operations, and I am opposed to proposals 62, 69 and 70. I raised my family on the back deck of our family boat fishing mostly on the west side of Kodiak Island which is the area that would be affected by these proposals.

Proposal 62 asks for the set gillnet (setnet) fleet to start fishing 48 hours before the seine fleet and for the seine fleet to be closed for 48 hours a week when the section is open all week to get back to a “traditional” harvest split between the seine and setnet gear groups. As noted by the Department of Fish and Game (F&G) in staff comments opposing this proposal “...this proposal would require commercial set gillnet only fishing periods, requiring more terminal fishing time in the Northwest Kodiak District as well as the Inner Karluk Section of the Southwest Kodiak District, jeopardizing local king, sockeye, pink, chum and coho salmon escapement.” Proposal 62 would limit the Department’s ability to control escapement and would result in forgone harvest opportunities of local stocks and force them to give the seine fleet more opportunity in inner bays and Inner and Outer Karluk when stocks are abundant. If F&G sees an abundance of fish in the Central Section under this proposal there would be a 72-hour delay (24 hour notice and 48 hour set gillnet only) to the ability of the seine fleet to harvest any of that abundance, enough time for those fish to travel through the Central Section and no longer be available for harvest.

As the data shows, there are less setnet permits fishing in the Central Section than there were in the 1990 to 2012 time frame, as well as much smaller early Karluk sockeye runs which both have contributed to this perceived shift in allocation. On top of that, in order to protect week local westside pink and chum stocks as well as the early Karluk sockeye runs there has been less fishing opportunity in the Central Section, which has resulted in more Karluk fish building up in Inner and Outer Karluk, which is a management decision for the health of the stocks but has resulted in more of the seine fleet sockeye and pink harvest coming from Outer and Inner Karluk as opposed to the Central Section.

There has also been an increase in algal slime as noted in proposal 67 from the 2020 Kodiak finfish Board of Fisheries (BOF) meeting which has at times rendered set gillnets unfishable contributing to the perceived allocation shift. The Board took action at that meeting to allow the use of monofilament web to try to counter the effects which I supported at the time. Add to that the fact that migration patterns



have shifted in the last ten years to more fish coming from the south as opposed to the traditional pattern of fish traveling from the north which means less fish swimming through the Central Section giving the setnet fleet less opportunities for harvest. When the fish are traveling from the south you could close the seine fleet completely and those fish would not necessarily be harvestable by the setnet fleet causing forgone harvest.

It has been stated that the seine fleet is more efficient now and thus fish are not getting into the Central Section. I'm fishing the same seine that I've had for 15 years, and my boat has less horsepower now than when I started in 2008 with the same hydraulic system. If the seine fleet was that much more efficient than how is it that the percentage of Alitak fish, that must travel through the seine only areas to get to the setnet areas, that are caught by setnets compared to the seine fleet has remained relatively consistent since the mid 80's? Or how come the percentage of Central Section Chum salmon caught by the setnet fleet compared to seine fleet has remained consistent in the same time frame. If the seine operations were that much more efficient now, then how are we only affecting the sockeye and pink harvests of the westside setnet fleet and not their chum harvest or the Alitak setnet fleet?

Proposal 69, which the department opposes, would require the department to have setnet only openings regardless of escapement levels in the Central Section and Karluk. This goes against sound management practices and would only contribute to a further decline in westside stocks, not helping any fleet out and for that reason alone should not be considered.

Proposal 70, which F&G also opposes, would create a westside allocation management plan. The Central, Inner, and Outer Karluk Sections are a highly mixed stock fishery with Sockeye, pink, chum, and coho stocks returning to hundreds of streams with highly variable run timings. There is no other allocative salmon management plan on mixed stocks in the state and there should not be here. If less setnet fishermen fish or the stocks are not traveling through the Central Section how could F&G manage to an allocation? Setnet effort has already declined from the years they want an allocation to match and given the state of salmon markets may decline even more. If this proposal were to pass it would force the Department to keep the seine fleet closed and if the setnet fleet couldn't harvest the fish no one would be able to harvest causing a great amount of forgone harvest going against the sustained yield principal in our state constitution.

I feel for the setnet fleet, but all fishermen are hurting. The markets for not just salmon but most Alaskan fisheries are in the worst state since the beginning of commercial fishing right now. Passing proposals that would create a forgone harvest of salmon in order to try to give a portion of those fish to the setnet fleet while harming the seine fleet and processors is not the answer. The Central Section is where a large portion of the small boat fleet and local westside village residents fish and the passing of any of these proposals could mean the end of their fishing careers. I support anything that will help the setnet fleet, like proposals 63 and 64, or even allowing longer set gillnets for each permit, but I do not support proposals 62, 69, and 70 which would harm the seine fleet and fish stocks.

Sincerely,

Matthew Alward



PC5

Submitted by: Stosh Andersonb

Community of Residence: Kodiak

Comment:

Proposal 57: I support this proposal to increase access for the food and bait herring market. The roe market is not adequate for the herring that is available.

Proposal 53: I oppose adding long lining pots to a fishery that is fully utilized with single line pot fishing. The stocks are susceptible to the negative impacts of warm ocean temperatures, now is not the time to add more gear to the fishery.

Proposal 53: Oppose

Proposal 57: Support



PC6

Submitted by: John Angst

Community of Residence: Anchorage, Alaska

Comment:

Dear Board of Fish Members,

I have been setnetting in Kodiak since 2016. I have been a setnet permit holder, fishing in Onion Bay on Raspberry Island, since 2017. I am a life-long Alaskan, born in Juneau and currently living in Anchorage. Both commercial and sport fishing in Alaska have been a part of my life for over 40 years.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

Setnetting is a family affair for me. My wife and I, along with our two sons, ages 10 and 8, spend eight to twelve weeks in Onion Bay every summer. Being able to live remotely and spend time as a family is extremely important to us. The work ethic and lessons that my boys are learning are invaluable and not something that can be taught as effectively at home in the city.

Additionally, we rely on the income from our setnet operation. Without this income my wife and I would be looking at the possibility of having to find additional summertime work in town. This would be of detriment to our family dynamic as we would be forced to spend more time away from each other and from our children.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

John Angst

Proposal 62: Support
Proposal 70: Support
Proposal 74: Oppose

Proposal 64: Support
Proposal 71: Support

Proposal 66: Oppose
Proposal 72: Oppose

Proposal 73: Oppose



PC7

Submitted by: Jason Barkemeyer

Community of Residence: Kodiak

Comment:

Proposal 49 there is no evidence that restricting Kodiak chinook fishery would impact/improve the Cook Inlet return. It has been established the chinook caught in Kodiak are returning to waters outside of Alaska.

Proposal 44: Oppose
Proposal 48: Support
Proposal 52: Support
Proposal 56: Support
Proposal 60: Support
Proposal 64: Oppose
Proposal 68: Support
Proposal 72: Oppose

Proposal 45: Support
Proposal 49: Oppose
Proposal 53: Support
Proposal 57: Support
Proposal 61: Oppose
Proposal 65: Support
Proposal 69: Oppose
Proposal 73: Oppose

Proposal 46: Support
Proposal 50: Support
Proposal 54: Support
Proposal 58: Oppose
Proposal 62: Support
Proposal 66: Oppose
Proposal 70: Oppose
Proposal 74: Oppose

Proposal 47: Support
Proposal 51: Oppose
Proposal 55: Support
Proposal 59: Support
Proposal 63: Oppose
Proposal 67: Support
Proposal 71: Oppose



PC8

Submitted by: Daniel Basargin

Community of Residence: Homer, Ak

Comment:

I do not support the jig cod quota splittibg to the pot quota.

Proposal 54: Oppose

Proposal 55: Support



PC9

Submitted by: Max Basargin

Community of Residence: Homer, AK

Comment:

No for 54, yes for 55. Jiggers deserve to keep their quota.

Proposal 54: Oppose

Proposal 55: Support



Submitted by: Miron Basargin

Community of Residence: Homer

Comment:

Please no sticky hands into small guy's cookie jar

Proposal 54: Oppose

Proposal 55: Support



Dear Board of Fish Members,

We are Lauri and Jeff Bassett and since 2006 have operated our family setnet operation in Uyak Bay which is part of the Central section of the Northwest Kodiak district. We hold two permits.

We would like to withdraw support for Proposal 65, of which we are the authors. The Kodiak Advisory Committee voted unanimously against the proposal. According to ADF&G it is not enforceable.

Of the proposals submitted by the Northwest Setnetters Association:

We are in support of Proposal 70. The Kodiak Central Section setnet fleet is struggling to remain viable. We cannot compete with the efficiency gained by the seine fleet over the last two decades. Further, poor pink salmon runs in the streams of the Northwest Kodiak District have hurt our gear group and we cannot move to other harvest areas. Finally, in recent years, the Karluk River sockeye is being harvested in the Southwest District in greater numbers. Currently, we are managed such that setnet openings and closure periods coincide with the seine fleet. A viable option is for the Central Section setnet fleet to be managed independent from the seine fleet. For this reason, Proposal 70 has our full support. Proposal 70 will provide a benchmark for ADF&G management. Most other areas in the state have instituted an allocation plan and we think Kodiak should be able to also develop an allocation plan.

We are in support of Proposals 62 and 71.

- **We support Proposal 62.** We don't think it's the complete answer but it's a tool that can be used to allocate fish to the setnet fleet. Without the defined math as put forth in Proposal 70, there is not a benchmark to determine its effectiveness.
- **We support Proposal 71** because it gives ADF&G more flexibility.

Over the years, we have experienced declining catch along with environmental challenges unique to stationary fishers. All fishers have challenges unique to their gear group. Building a management plan that allows ADF&G to respond to gear groups independently allows the department to better manage allocation. Given the limited options for setnetters to enhance efficiency and increase catch volume, our gear group depends on ADF&G to effectively manage the fishery, ensuring a robust return and a prosperous harvest that translates into economic gains for all permit owners.

We are opposed to Proposals 66, 72, 73, and 74. Without an independent allocation plan, the result of these proposals increases opportunities for the seine fleet which directly decreases opportunities for the setnet fleet, which is struggling to remain viable.

Thank you for your consideration.

Sincerely,

Lauri & Jeff Bassett



Dear Board Members,

My name is Mark Beardsley, a Kodiak Westside setnet fisherman and permit holder. I have been actively participating in the Kodiak salmon setnet fishery, on the Westside of the island for over 4 decades in Uyak Bay. My wife and I currently reside in Kodiak and have lived in the State of Alaska since 1995.

I am writing in **support of Proposals 62, 63, 64, 70 and 71**, all of which provide some relief for our struggling fishery. Setnetters in the Central Section of the Kodiak Management Area have lost historic catch share from the areas we are managed by on the Westside. Setnetters are struggling in recent years to keep their businesses viable. Our ability to pay a fair wage has diminished to the point so hiring and retaining crewmembers is problematic. All of these proposals aim to reverse these trends by providing some needed help to our setnet fishery.

Proposal 62 provides time and area opening for our gear type. Currently, all gear types fish simultaneously alongside each other during any opening in the Central Section and this is becoming more problematic for set gillnet operations. We are trying to compete with more efficient seine operations having superior communications, mobility and harvest capabilities.

Proposal 63 provides an individual who doesn't have an available family member, spouse or child, who can be present for 3 or more months, the ability to fish 2 set gillnet permits resulting in more stability in their operation and added revenue to be spread amongst crewmembers and the local economy. Additionally, two permit operations currently on the market "for sale" will actually be desirable by a single individual if this Proposal were to pass. It would allow new entrants into the fishery where otherwise it could be financially challenging with only 1 permit as an option to an individual.

Proposal 64 provides a gear modification to address set gillnet efficiency. Set gillnetters have increased their number of nets available in varying mesh sizes trying to keep their operations as efficient as possible. Setnetters now have a "quiver" of nets for targeting different sizes of fish and/or timing of different runs during the season attempting to gain as much harvesting capability as possible. Adding to the length of the hook may provide needed harvesting abilities while at the same time it will be sacrificing length and distance off the beach. This Proposal, if passed, will see mixed use depending on the location of the site but could provide needed help for some operations.

Proposal 70 provides immediate and measurable relief for a struggling fishery by restoring noticeable catch share losses. Proposals 62 and 64, mentioned above are a few tools that could be utilized to try and reach an allocation goal. Terminal areas, adjacent to the Central Section, are currently available to other gear types to manage over escapement concerns.

Proposal 71 is a simple housekeeping matter and provides the Department better flexibility. Early-run sockeye escapement to the Karluk River system is more attainable with this proposal



while providing possible opportunity for all gear types in the Central Section. Additionally, this proposal will most likely increase Chinook salmon escapement into the Karluk system.

I am **opposed to Proposals 66, 72, 73, and 74**, all of which would diminish opportunities for the gillnet fleet on the Westside, which is already struggling to survive.

Thank you for your time and consideration.

Sincerely,

Mark Beardsley



December 23, 2023

Dear Board of Fish Members,

Thank you in advance for your process to address our needs. My name is Sheila Beardsley and I am a setnet permit holder and fisher on the west side of Kodiak. I started in this industry in 1989 as a processor at Kodiak Salmon Packers, from there I moved to setnetting with my husband and we obtained another permit in this fishery to make it viable for our family. I live in Kodiak year-round

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

During most of the past 30 years, our fishing went along status quo, of course with a few bumps along the way during some seasons. Because I work on the water daily for all these years I observe the ebb and flow of what's happening. In more recent years, as the salmon remain to return thankfully to our area (Uyak Bay and Shelikof) and we chug along with our traditional ways of fishing, that is not so for the seine fleet. Their boats have gotten larger and are more equipt with technology to harvest what is affecting us and ultimately divert the salmon when the seine fleet makes a wall of nets and boats. This takes place before the salmon get a chance to move into our area, where we remain a traditional stuck gear wishing and hoping for a piece of the salmon runs. This loss of harvest not only affects our livelihood but also impacts our ability to employ crewmembers. We need the crew to help with this manual fishery and we want to continue to employ people. We enjoy sharing our way of fishing with the crew as well as enjoying the area we live in and believe to be one of the most beautiful places!

I am strongly opposed to proposals 66, 72, 73, and 74, all of which have the potential to diminish the setnet fleet opportunity, which is already failing.

Thank you for your consideration, we look forward to seeing you in January.

Sincerely,

Sheila Beardsley



Submitted by: Arthur Becker

Community of Residence: Kodiak, AK

Comment:

Hello, my name is Arthur Becker, I'm 38. I've lived in Kodiak my whole life and was introduced to seining when I was 16. I just bought a seiner that I ran in 2022 and 23. The current economic turmoil/prices are not making it easy to keep my small business afloat. Naturally I'm opposed to any proposals that would limit my fishing time, restrict options to areas/opportunity or don't make sense scientifically.

Proposal 60: Support	Proposal 62: Oppose	Proposal 65: Oppose	Proposal 66: Support
Proposal 67: Oppose	Proposal 68: Oppose	Proposal 69: Oppose	Proposal 70: Oppose
Proposal 72: Support	Proposal 73: Support		



Submitted by: Lacey Berns

Community of Residence: Mckinleyville CA 95519

Comment:

I am commenting on Proposal 63 which I submitted. Attached are comments and excerpts from CFEC Report No.13-4-N Kodiak Salmon Set Gillnet Permit Stacking (2013) to the Board of Fisheries

Proposal 62: Support With Amendments	Proposal 63: Support With Amendments	
Proposal 64: Support With Amendments	Proposal 65: Support	Proposal 66: Oppose
Proposal 67: Support	Proposal 68: Support	Proposal 69: Support With Amendments
Proposal 70: Support	Proposal 72: Oppose	Proposal 73: Oppose
Proposal 74: Oppose		



Lacey J Berns

Comments on Proposal 63 To Allow Permit Stacking in the S04K fishery

Submitted by myself. 12/26/23

Also attached " CFEC Report No. 13-4-N "The Kodiak Salmon Set Gillnet Permit Stacking (2013) presented to the Board of Fisheries.

Board of Fisheries members:

Thanks for your interest in proposal 63.

Background

I started setnetting in Kodiak in 1977. I've fished at 9 different sites and also raised my 4 children between Uganik and Viekoda Bay, In the Central Section. We also owned 4 different seiners during this time.

Over the span of 4 decades, our salmon fishery has completely changed and is now in crisis. What was once a fishery that supported us and sent our kids and crew to college, is now completely devastated by low prices, lack of opportunity (ADFG closures) and the expense of gear, skiffs, and outboards. Added to that, we've lost access to experienced, enthusiastic crew because most of them have migrated to Bristol Bay--more lucrative than a 3 month Kodiak season. My kids can't make any money fishing with me. I've started paying about 50% to the crew so that I can operate.

Many of us felt that this season was the most stressful season we'd ever experienced. Prices collapsed. Canneries ran out of cans during the best late red season in 9 years, ADFG closed us for 2 weeks the 3rd week of July. The average of the setnet fleet was \$22,000.

The stark reality now is that many of us may not survive this collapse.

Proposal 63: Gillnet Specs and Operations-Why?

At the least, this proposal would eliminate some of the stress of emergency transfers and allow us to continue to fish the gear, 2 permits (purchased the 2nd in 2003) and site-the result of financial investment for nearly 4 decades.

The myth of consolidation no longer applies to S04K.

"Stacking" should not be a terrifying word any longer. I submitted the proposal to allow 2 permits in one name, because at the very least, it may help us to continue to fish. (Consolidation might be a threat under a robust and thriving fishery.)

CFEC stringent enforcement: It's become difficult to transfer within the family

We bought our second setnet permit in 2003 and have always had it in one of the kids' names because eventually they've grown up to run the skiff. *We have always had a relatively easy time transferring permits within the family until 2020 when CFEC cracked down and became extremely conservative.*



Economics & reality on the grounds

We only have 2 viable “sets” we’ll never buy another permit again.

There is no economic incentive to purchase additional permits, and gear (new outboards are \$13,000, a net is \$3500, groceries \$3000, etc) if we can’t afford to fish as it is.

Looking at the average income of \$44,000 over the past 20 years, permits and sites have no buyers.

In reality, most setnetters don’t have the “room” to put an additional permit.

In Viekada, most of us are over 65 and the transferee “pool” of kids/crew has exited setnet fishery.

Some of our spouses can no longer participate due to illness or disability.

We used to think that selling our sites would provide a decent retirement fund. Not so any longer.

Kodiak is wide open for young fishermen:

It's never been a better time for young people to get into the setnet fishery.

As far as excluding young entrants in the Kodiak setnet fishery, that's no longer the case. For example, a 2 permit site that had been purchased for over \$750,000 in 1997 was sold last year for \$200,000 including private land, state of the art aluminum skiffs, gear, cabins, to 2 young women in their twenties!

Many of my friends have listed theirs, without any interest.

In conclusion, I think this would be such a helpful proposal for many of us, especially because we're aging. A tremendous amount of attention has been paid to young fishermen in Alaska as opposed to the “forgotten” veterans of this amazing livelihood, that few of us want to leave.

Thank you very much for your time and consideration,
Lacey J Berns

The following excerpts are submitted to provide insight for the S04K situation.

CFEC Report No. 13-4-N The Kodiak Salmon Set Gillnet Permit Stacking (2013) presented to the Board of Fisheries

- Kodiak implemented stacking from 2008-2010 and it was allowed to “sunset”. It covers the fishery until 2012. Despite being 12 years in the past, there are several factual statistics noted.
- “The residency of persons who fished with stacked permits does not appear to be substantially different from the proportion of resident types in historical or current single permit operations.” (p.3)
- “Between 2008-2010 the Relationship of Transferors to Transfer Recipients by Year (table) shows that 87-89% were between “friend, partner, immediate family, or other relative.” (p.5)
- Contrary to concerns that stacking would encourage greater numbers of Emergency Transfers, Table 5 shows that between 1975-2012, the average % of ETs was 7.7%. Between 2008-2010 the rate was 7.6%. (p6)



- Table 8. “New Entrants in the Kodiak Salmon Set Gillnet Fishery”
Contrary to the concern that stacking would stymie new entrants in the Kodiak fishery under the assumption that permit prices would increase, this table shows that between 1990-2012 an average number of new entrants was at 9%, exactly the same between 2008-2010.
- Age of Permit Holders
Table 9. Median age of Select CFEC Permit holders, between 1975-2012. The age of Kodiak Salmon Setnet permit holders has increased from age 39.9 to 53.5 over 37 years. If that rate holds true for the past 12 years, you might expect the average age to be in the low 60s. I am 69. I'll be 70 in a month



Submitted by: Richard Blanc

Community of Residence: MOUNT VERNON, WA

Comment:

Board of Fish:

Proposal 63

5 AAC 18.331. Gillnet Specifications and Operations

Allow permit stacking in the set gill net salmon fishery

I Richard Blanc, Kodiak set gill net fisherman for 52 years urge you to put proposal 63 into regulation.

My wife and I have four S04K permits that we fished as a family for years. The kids are grown and have vocations of their own, which don't allow them to fish. In order to make a living we need the harvest of 4 permits. Under current regulations in order to fish all our permits we need to permanently transfer 2 of our permits to crewmen. When they are no longer crewmen there is no guarantee that we will get the permits permanently transferred back to us.

I was the author of the 2008 dual permit regulation that was sun set for 3 years and not put into regulation permanently by the following BOF.

During those 3 years there were 38 dual permit fishers, the majority were Alaskan residents living in Kodiak.

There was no absentee ownership and no consolidation of the fleet as those in opposition feared.

By passing regulation 63 into regulation, family operations will have a better chance of survival. Permits will be stabilized and a mountain of paperwork will be eliminated by the CFEC. It will help Alaskan residents.

Thank you for your consideration of this matter,

Richard Blanc

Proposal 64: Support



Submitted by: Jason Blondin

Community of Residence: kodiak

Comment:

My name is Jason Blondin as the author of Proposal 54 I believe there needs to be a set percentage of 25% for March 25th, to trigger an opener for pot fisherman on April 1. Allowing pot fisherman to harvest half the remaining jig sector TAC as of March 25th. I am proposing 25%, because looking at all the information that I was provided by the department it shows that jig fisherman on average harvest 13.7% by March 25th. The average TAC caught on the years the jig sector harvested 90% or more of their TAC, they averaged 25.4%. I am trying to make sure all the TAC is harvested from both gear types without having to propose a new adjusted allocation. Giving jig fisherman the same opportunity to catch their TAC, but have a way to reallocate mid season if it appears they will not meet the TAC. Going back to 1997 when the state water fishery started the jig sector they only harvested the TAC 10 times leaving a significant amount uncaught and rolling over to pot fisherman late in the year. After the federal B season TAC was reached when most local processors were not buying until the new year for the A season.

Proposal 55 wants to set the percentage at 12.3%, which is the 10 year average caught by March 25th. I believe this number will not work, because out of those 10 years they only harvested the full TAC twice. The numbers will show going with a 10 year average that will not insure that TAC to be achieved on most years, leaving us with the same problem we are currently in with no resolution. With that said I would like board to consider Proposal 54 so we can meet the TAC in both gear types leaving no quota uncaught every year.

Proposal 54: Support
Proposal 66: Support
Proposal 72: Support

Proposal 55: Oppose
Proposal 67: Oppose
Proposal 73: Support

Proposal 62: Oppose
Proposal 68: Oppose

Proposal 65: Oppose
Proposal 70: Oppose



Submitted by: Curtis Bollinger

Community of Residence: Kodiak, AK

Comment:

As a second generation Kodiak small-boat seiner, I support all of the Kodiak Seiners Association's positions on these proposals. I am heavily invested in this fishery and my family's livelihood depends on it. Even without the current downturn in salmon markets, some these proposals, especially 62 and 70, would be detrimental to my ability to support my family and maintain my fishing operation.

I oppose proposals 62 and 70 because they would greatly affect my livelihood as a small boat fisherman, as I spend a large portion of my season fishing in the central section, due to it's fishability during bad weather, and my ability to fish multiple locations with minimal travel time and fuel consumption.

I support proposal 66 because it would simplify net building and repairs as well as lower cost. This proposal would not affect harvest volume.

I'm opposed to proposal 67 because it would limit the ability of the fleet to spread out during the late season.

I'm also opposed to proposal 68 because it would limit the ability of the fleet to harvest late-season pinks and reds. Also, these closure dates are too early in the coho run to worry about their escapement, since they run much later in the season. We already have escapement goals, anyways.

I also support proposals 72 and 73 for the reasons given by the Kodiak Seiners Association.

Proposal 60: Support
Proposal 67: Oppose
Proposal 73: Support

Proposal 62: Oppose
Proposal 68: Oppose

Proposal 65: Oppose
Proposal 70: Oppose

Proposal 66: Support
Proposal 72: Support



Submitted by: Nina Burkholder

Community of Residence: Homer, AK

Comment:

Subject: SUPPORT for Proposal 63 - Stacking of Limited Entry Permits in Kodiak Salmon Set net Fishery

Dear Chairman Wood and Board members:

I am writing to express my strong support for Proposal 63, which advocates for the stacking of limited entry permits in the Kodiak salmon set net fishery. I believe that allowing one person to hold and operate two permits will significantly contribute to the financial stability of fishing operations in the region and foster the creation of more job opportunities within the industry.

In our ever-changing economic landscape, the fishing industry faces numerous challenges, and Proposal 63 presents a practical solution to enhance financial sustainability. By permitting the stacking of limited entry permits, individual fishing operations can achieve greater efficiency and scale, which is crucial for navigating the complexities of the market and maintaining a robust presence in the industry.

Furthermore, the proposed measure aligns with the goal of promoting job growth within the fishing sector. Providing the means for operators to expand their fishing activities can, and will, lead to increased employment opportunities. This not only benefits individuals directly involved in fishing operations but also has positive ripple effects throughout the local economy.

I appreciate the Board's dedication to ensuring the prosperity of Alaska's fisheries, and I believe that embracing Proposal 63 will contribute significantly to achieving this objective. I urge the Board to carefully consider the potential positive impact this proposal could have on the financial well-being of fishing operations and the overall growth of the industry. Thank you for your time and consideration of my views on this matter.

Sincerely,

Nina Burkholder

Homer, Alaska

Proposal 63: Support



PC20

Submitted by: Emily Capjohn

Community of Residence: Kodiak, Alaska

Comment:

I am a Kodiak salmon permit holder. I oppose proposal 63 and all permit stacking proposals.

Sincerely

Emily Jean Capjohn

Old Harbor and Kodiak, Alaska

Proposal 63: Oppose



Submitted by: Robert Carter

Community of Residence: Kodiak

Comment:

My name is Robert Carter.

I'm the owner operator of FV Faith.

I jig cod out of Kodiak and am opposed to proposal #54 and in favor of proposal #55

The rollover system has only been in place for 3 years and so far is working as intended.

ADFG, In addition to considering factors such as weather conditions, the number of participants and past data illustrating jig harvest picks up in April after the pot sector closes, the ADFG has been using the latest 10 year average of 10.2% caught by March 25th to decide whether or not to rollover.

2021 the quota did not roll over and jiggers caught over 93%

2022 the quota rolled over giving pot boats access.

2023 the quota DID NOT roll over, and the jig fleet caught the quota. However the pot boats were counting on a rollover, with many leaving their pots onboard anticipating a rollover.

Their reaction is proposal 54, raising the bar to make it more difficult for the Jig fleet to prevent a rollover.

Had proposal 54 been in place in 2023, the quota would have rolled over and jiggers would be out of a job.

In fact, had proposal 54 been in place, only 3 out of the last 20 years would NOT have rolled over to the pot fleet, despite the jig fleet effectively catching the quota 9 out of the last 20 years.

I've heard a lot of talk of "compromise", "meeting in the middle".

This is nothing short of an attempted fish grab and any "compromise" over the 10 year average of 10.2% is the jig fleet just giving our livelihoods away!!

I implore the BOF member to look at the science that ADFG has been using to make the determinations and not just pick an arbitrary number in between the two proposals #54 (25%) and #55 (10.2%)

The Kodiak Advisory Committee understood this and voted to amended proposal #54 from 25% to 10.2%

I ask that the BOF either:

A: Do nothing.

The cod rollover is new, so far is working as intended.

Doing nothing and tabling 54-55 allows 3 more years to fine tune the science before settling on a unchangeable percent written in stone. It allows ADFG to take in other factors like weather and fleet participation when determining rollover and allows ADFG to update the 10 year average % on a yearly basis.

B: Go with proposal 55 and the 10 year average of 10.2%

This number is the most recent 10 year average, whereas proposal 54 uses an average based only on years quota was caught and goes back to days with there were hundreds of boats in jig fleet and the canneries even tendered the jig fleet.

It's unrealistic to expect the jig fleet to catch that percent when the jig fleet is a 3rd it's size from those days.

The jig fleet is compromising yet again with locking in a percentage as the area managers will not be factoring additional considerations to inform the rollover decision. The jig fleet recognizes the position this puts area managers in and is responding to the concerns with the compromises found in proposal 55.

Again i implore the BOF to not "meet in the middle" with some arbitrary number. It sets a bad precedent as anyone could challenge our quota, set a high % number and hope we'll meet in the middle. We shouldn't have to compromise our livelihood away when the rollover WAS the compromise, and is working as intended.

Thank you for your time and consideration.

Robert Carter FV Faith

Proposal 54: Oppose

Proposal 55: Support



Chairman John Wood
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposals 62 and 70, and proposal 66

Dear Chairman Wood and Board of Fish members:

My name is JD Christiansen, and I am a seiner from Old Harbor, Alaska. I am writing today to express my strong **opposition to proposal 62 and 70** from the Northwest Setnet Association, and **support proposal 66** from the Kodiak Association.

I have been operating my own seiner in Kodiak since 2012 when I bought a 38-foot Ledford. I have since upgraded to a 45-foot Hoquiam that I bought in 2020. I have watched the seiners in my community slowly diminish from 30 boats when I was a kid, down to 6 boats actively fishing in the salmon fishery. Fishing has always been the main economic driver of our community and I see proposals **62 and 70** as a danger to the remaining participants from our community.

If these proposals were to be passed, the seine fleet stands to lose a large portion of our season in days. Our fishery only works because of the longevity of the season and the access to multiple species to harvest. I urge you to consider the implications these proposals would have on the economies of the smaller communities around Kodiak, as lost revenue for individuals like me only further strengthen the burden of living in high cost areas.

I support proposal 66 which would allow me to get rid of the 7" lead web component of my net and replace it with 3.5" normal seine web. The cost savings alone are my main focus, as I can get traditional seine web at a fraction of the cost of new lead web. As the only area in the state with lead web requirements remaining, I think it is high time the Board consider changing this.

I ask that the Board be careful in taking action on these proposals as we are in a precarious time in the fishing industry with prices well below average, and processing companies in volatile markets. We cannot afford to lose anymore.

Sincerely,

JD Christiansen



John Wood, Chair john.wood@alaska.gov
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811

November 9, 2023

Re: Kodiak Proposals

Dear Chair Wood 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, we respectfully ask you to consider our comments:

Proposal 59 - OPPOSE

We oppose this proposal to amend Statewide Hatchery Basic Management Plans to reduce hatchery production to 25% of the year 2000.

Hatchery Regional Planning Teams members include representatives from Alaska Department of Fish and Game and hold strong backgrounds in the science behind hatchery production, as well as a thorough understanding of local ecologies and regional fisheries. Their open public meetings include scientific reports and presentations based on the most current research available. We support this public framework and would like to see recommendations related to hatchery management to be made through RPTs who have vetted the matters.



Cordova District Fishermen United
PO Box 939 | 509 First Street | Cordova, AK 99574
phone. (907) 424 3447 | fax. (907) 424 3430
web. www.cdfu.org



PC24

Thank you for your time and consideration of our comments. We greatly appreciate the attention to the issues facing our fleet and fisheries. Should you have a need for us to help clarify anything regarding our comments, please don't hesitate to contact me.

Sincerely,

Jess Rude
Executive Director



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PC24

John Wood, Chair john.wood@alaska.gov
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811

November 9, 2023

Dear Chair Wood and Members of the Board of Fisheries,

Cordova District Fishermen United (CDFU) requests that you do not pass a board-generated proposal delegating the Alaska Department of Fish and Game (ADF&G) the authority to close state waters to commercial fishing with specific gear types for the purpose of rockfish conservation. ADF&G passed an emergency petition to gain temporary emergency order (EO) authority and has used that new power to close areas of Prince William Sound (PWS) to commercial longline fisheries for now. This emergency petition can be extended or renewed; any discussion on making these regulatory changes permanent belongs in a normal, scheduled board cycle meeting.

A proposal to permanently grant EO authority to ADF&G for groundfish simply does not meet the Criteria for Development of Board-Generated Proposals as printed in the Commonly Used Regulations and Policies of the BOF¹ for the following reasons:

1. It is deeply controversial whether this is in the public's best interest. We would first like to have an opportunity to actually work with ADF&G to find practicable ways to protect rockfish in PWS.
2. There is no urgency in considering the issue, as the emergency powers granted to ADF&G can be extended, or another emergency petition considered.

¹ Alaska Joint Boards of Fisheries and Game: Criteria for Development of Board-Generated Proposal, from: http://www.adfg.alaska.gov/static-f/regulations/regprocess/fisheriesboard/pdfs/2018-2019/common_used_policies.pdf

1. Is it in the public's best interest (e.g., access to resource, consistent intent, public process)?
2. Is there urgency in considering the issue (e.g., potential for fish and wildlife objectives not being met or sustainability in question)?
3. Are current processes insufficient to bring the subject to the board's attention (e.g., reconsideration policy, normal cycle proposal submittal, ACRs, petitions)?
4. Will there be reasonable and adequate opportunity for public comment (e.g., how far do affected users have to travel to participate, amount of time for affected users to respond)?



3. The current process of normal board cycle proposal submittal is better suited for discussion of this item.
4. Having this discussion at the Kodiak BOF meeting on January 9th would not create reasonable and adequate opportunity for public comment. Traveling to Kodiak in the middle of winter is difficult for everyone, and the holidays are a challenging time for stakeholder groups to prepare comments and organize testimony. Furthermore, putting a proposal as controversial as this into the Kodiak meeting would diminish opportunity for public comment on the issues of vital importance to Kodiak.

CDFU represents commercial longliners in PWS and is willing and ready to work with ADF&G to find the best way forward to protect rockfish in PWS. There are many ways that CDFU could collaborate with ADF&G to help protect rockfish. We are disheartened that ADF&G never contacted us to communicate their concern for rockfish before making their emergency petition. The petition, which came after longline fishing in PWS effectively was over, claimed that "seeking the assistance of participants in the halibut longline commercial fishery to set gear away from aggregates of rockfish habitat has proven ineffective".

Unfortunately, we have yet to find a PWS longline fisherman who was contacted by ADF&G about this issue. We are struggling to find the advisory announcements regarding PWS rockfish conservation that were cited in the emergency petition. We want a real opportunity to work with ADF&G on protecting rockfish in PWS before permanent regulatory changes are made and areas are closed to fishing.

The regulatory changes that ADF&G requested in the emergency petition are immensely controversial, and may have far reaching impacts on the commercial fishing sector and commercial fishing dependent communities throughout Alaska. The current closures in PWS, if extended into next summer and beyond, will have a devastating effect on the small boat longline fleet operating out of Cordova. Many of our members longline from their "bowpicker" vessels which once loaded down with longline gear cannot safely fish outside of PWS. By excluding those vessels from areas of PWS, these longline closures will also effectively be reallocating PWS halibut from the commercial to the sport sector.

Stakeholders and the public deserve ample time to respond to controversial proposals that are as potentially allocative and impactful as this is. A board-generated proposal passed at this point would be brought to the Kodiak meeting in January, which is an inappropriate time and place for this discussion. It is expensive and time consuming for our members to travel to Kodiak in the middle of



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PC24

winter. The regular, in-cycle PWS BOF meeting scheduled for December 2024 is the right place for such a proposal to be debated. Before permanent regulatory changes are made, we would like to have the opportunity to work directly with ADF&G to identify rockfish habitat of concern and direct fishermen away from it. Similar work has successfully been done in Southeast Alaska by Alaska Longline Fishermen's Association (ALFA).

For all of these reasons, CDFU is urging all BOF members to vote against any board-generated proposals delegating EO authority to ADF&G for the purpose of rockfish conservation. We are ready to work directly with ADF&G and members of the Board of Fisheries to find the best ways forward to protect rockfish.

Sincerely,

Jess Rude
Executive Director

cc: Märít Carlson-Van Dort marit.carlson-vandort@alaska.gov
Gerad Godfrey g.godfrey@alaska.gov
Mike Wood mike.wood@alaska.gov
Tom Carpenter tom.carpenter@alaska.gov
Stan Zuray stan.zuray@alaska.gov Greg Svendsen greg.svendsen@alaska.gov



Submitted by: Glenn Crocetti

Community of Residence: Kodiak, AK

Comment:

To whom it may concern:

My name is Glen Crocetti. I am the owner/operator of the F/V Alpha Centauri and a Kodiak seine permit holder and fisherman. I am writing in opposition to proposals 62 and 70.

-I do not support 48-hour only setnet fishing periods in the central section.

-Given the current state of the salmon fishery and the current state of the market, domestic and worldwide, I do not believe any extra prohibitions on seine fishing would be healthy for the Kodiak fleet.

-maintaining a professional crew for such a long season is one of the many challenges of seine fishing in Kodiak throughout the summer. One thing that tends to build cohesiveness is to keep the crew working. Standing down for an additional 48 hours each week would be far less than ideal.

-2024 will be my 6th year seining. As a new captain, I found most of the sets that would be impacted by the proposal are the places that I could learn to fish, train a crew, and stay in seas that my 38-foot boat could manage. The areas in question were key to building my experience and gave me a strong start in the fishery. Further restrictions in this area would make it more difficult for those just starting out. The central section is pretty much where I fish for 90-100% of my season.

I am also opposed to proposal 68. This would crash the Karluk sockeye run and harm everyone.

Proposal 53: Support
Proposal 70: Oppose

Proposal 54: Oppose

Proposal 66: Support

Proposal 68: Oppose

Submitted by: Glenn Crocetti

Community of Residence: Kodiak. AK

Comment:

To Whom it may concern,

I'm writing this to inform the Board of my strong opposition of proposal 54. My name is Glenn Crocetti. I'm the owner operator of the F/V Alpha Centauri. I have been involved in the Jig fishery since 2008 and I have been a permit holder since 2013.

Given the current state of all fisheries in general, and the state of world markets/fish prices, The jig fleet, I believe could only suffer from a lack of fishing opportunity. I believe the Jig Sector to be under enough pressure for its participants to catch there allotment of the GHL with the current numbers adopted by ADF&G. On a year like 2024, with a relatively small quota, the catch in question will mean the survival of some boats.



Submitted by: Peter Danelski

Community of Residence: Kodiak, AK

Comment:

Dear Board of Fish Members,

I am a lifelong Kodiak Setnetter and Kodiak resident. I have held a permit since 1987 and my family runs a multi-permit site in Uyak Bay that's been in operation since 1972.

Proposals 62, 64, 70, and 71 were submitted by the Northwest Kodiak Setnetters. I'm not sure how to best address the declining viability of the Kodiak set net fishery, but as it's currently run, I don't even get the hours that are allotted every opening. Fishing multiple permits means the gear takes a while to set and I miss time on the front end of an opening. When the season closes, I have to start pulling nets early to make sure all the nets are out of the water by the closing time. I will never get the full hours of any opening, and sometimes, I might miss out on the last 10 hours. Right now I fish in a considerably smaller area than the Kodiak seine fleet, for fewer hours every opening. Extra time would be a step toward equity, and make it easier to stay in business.

Proposal 63 allows permit stacking of Kodiak set net permits. This is a fishery where the average income from one permit probably won't pay expenses, and there is time to fish multiple permits from one skiff. Fishing more than one permit from a skiff is more efficient and makes sense to increase profitability. In fact, that is what we, and many families have been doing for years. The problem is, sometimes family members need to leave the site and we can't fish at full strength. Stacking permits would make staying profitable more likely, and I support proposal 63.

Thank you for your consideration.

Sincerely,

Peter S. Danelski

Proposal 62: Support
Proposal 70: Support
Proposal 74: Oppose

Proposal 63: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose



Submitted by: Miles Dennis

Community of Residence: Anchorage, AK

Comment:

I am writing in support of proposals 62, 64, 70, and 71. I believe that these actions will help stop the rapid decline in harvest percentage in relation to the seine fleet. I have fished at setnet camps for all of my adult life, and have seen one die already in Cook Inlet. Having participated in Kodiak setnetting, I have seen firsthand that the economic, social, and cultural value of the fishery is immeasurable. If we are not careful we risk losing this important fishery, not because of a lack of fish, but because of an allocative imbalance. I urge the board to consider adopting these proposals. Thank you.

Proposal 62: Support	Proposal 64: Support	Proposal 66: Oppose	Proposal 70: Support
Proposal 71: Support	Proposal 72: Oppose	Proposal 74: Oppose	



Submitted by: Henry Dera

Community of Residence: Kasilof, AK

Comment:

Proposal 62 and 70- I am in opposition to proposals 62 and 70.

Many factors are or could be contributing to the decline in set net harvest percentages. Environmental factors such as algae blooms, warming water, changing migration patterns, changing run timing, smaller fish size, and mammal predation are all issues cited by set net fisherman. Changes in set net operations such as reduced effort and consolidation of set net permits in multi permit "family" operations that share resources to improve bottom lines also has a negative effect on the overall per permit harvest percentages.

After the collapse of the salmon market this past season, many fishing operations both seine and set net alike are operating marginally at best. Allocating fishing time to set nets unfairly places the blame and financial burden for declining harvest percentages on the seine gear type. A large percentage of my harvest is caught in the central section of the NW Kodiak district and the loss of fishing time in my most productive area at a time of historically low salmon prices, high inflation, and market uncertainty has a high potential to cost myself and others our livelihoods.

Proposal 62: Oppose	Proposal 63: Oppose	Proposal 64: Oppose	Proposal 65: Oppose
Proposal 66: Support	Proposal 67: Oppose	Proposal 68: Oppose	Proposal 70: Oppose



Submitted by: Jennifer Dera

Community of Residence: Kasilof, AK

Comment:

To Whom is May Concern:

Thank you for the opportunity to comment.

Proposals 62 and 70 do not address the real issues behind the declining harvests for west side fishermen. It would be more beneficial for setnet fishermen to extend their fishing days and areas to maximize their harvest percentages.

Additionally, as a family deeply rooted in commercial salmon seining, I am extremely concerned about the negative implications of these proposals. They could be extremely harmful to not only our operations but our livelihood, as well as other the livelihoods of other fishermen and Kodiak Island's fishery-dependent economy.

Sincerely,

Jennifer Dera

Proposal 62: Oppose

Proposal 63: Oppose

Proposal 66: Support

Proposal 67: Oppose

Proposal 68: Oppose

Proposal 70: Oppose

Proposal 73: Support

**Douglas Island Pink and Chum, Inc.**

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P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
Submitted online form 12/21/2023

December 21, 2023

Members of the Alaska Board of Fisheries,

Douglas Island Pink and Chum Inc. (DIPAC) is a private non-profit hatchery corporation based out of Juneau, Alaska. The mission of DIPAC is to sustain and enhance valuable salmon resources of the State of Alaska for the economic, social, and cultural benefit of all citizens, and to promote public understanding of Alaska's salmon resources and salmon fisheries through research, education, and tourism.

DIPAC wants to express gratitude for the removal of proposal 59 from the Kodiak meeting.

If this proposal were to be accepted as written, it would lead to significant negative impacts on fishing opportunity for all user groups, communities, and stakeholders where hatchery raised salmon are harvested. Hearing a statewide hatchery proposal in Kodiak makes it very difficult for stakeholders from Southeast Alaska to be able to participate in the meeting.

DIPAC cares greatly about the affects their programs have on users of the resource, the near shore and marine environment, and wild salmon. We are continually striving for knowledge of how to better our programs for the human users and for the greater near-shore and marine ecosystem.

Respectfully,

Katie Harms
Executive Director - DIPAC



Submitted by: Don Dumm

Community of Residence: Kodiak

Comment:

Dear Members of the Board of Fisheries,

There has been a decline in the setnet share of overall catch in the NW district over the last 20 years. This amounts to a gradual reallocation of the resource. The Northwest Setnet Association, (NWSA) has written 4 proposals, 62, 64, 70 and 71 in an attempt to stop and hopefully reverse that decline. I am writing in support of those proposals, realizing that they may, if enacted, result in a reallocation of the resource. Again, our point is that the reallocation has already occurred over the previous 20 years and these proposals only seek to bring the setnet catch share back to pre 2000 levels.

I oppose proposal 74 which would splinter the existing Central Section of the Northwest Kodiak District into 3 smaller sections. This would result in eliminating opportunity for setnet fishers in sections that may close and increase competition with the seine fleet in the open section(s). The result would be a further reduction in setnet catch share. The Department already has the tools it needs to manage the fishery by regulating fishing time in the inner bay sections.

I oppose proposals 72 and 73, which would increase catches of fish migrating through SW Afognak Section (72) and Sturgeon River Section (73). While increasing opportunity for the seine fleet, these proposals would result in less opportunity for setnet fishers in the Central Section.

I also strongly oppose proposal 63 allowing a permit holder to fish two permits (stacking). This is consolidation that would benefit fewer participants at the expense of opportunity for future entrants to the fishery. It does absolutely nothing to remedy the diminishing catch share that NWSA is trying to address. It does split that diminishing catch into fewer pieces, a temporary and I believe short sighted attempt at financial gain. My wife and I have opposed stacking since its inception. It runs counter to the intent written in the Alaska State Constitution to maximize the benefit and use of our resources for all citizens of our state.

Sincerely,

Don Dumm

PO Box 1723

Kodiak, AK 99615

Proposal 62: Support
Proposal 67: Support
Proposal 71: Support

Proposal 63: Oppose
Proposal 68: Support
Proposal 72: Oppose

Proposal 64: Support
Proposal 69: Support
Proposal 73: Oppose

Proposal 66: Oppose
Proposal 70: Support
Proposal 74: Oppose



Submitted by: Daniel Earle

Community of Residence: Baltimore, MD.

Comment:

Proposal 63

As the fleet ages and setnet harvests decline, this proposal would enable aging permit holders with long-term or permanent medical conditions that impact their ability to actively participate in the fishery, to bypass C.F.E.C.'s restrictive 2 year maximum medical transfer regulation. Such a change would have no negative impact on fleet harvest figures, and would enable individual setnet operations to maintain their historic average catches. We fully endorse this proposal.

Proposal 64

The 25 fathom hook was likely established as a reaction to the large harvests of cannery-owned fish traps before Statehood. Stationary setnets were likened to traps and have been limited to innovation by this comparison. Now, with the steady decline in setnet harvest figures and therefore profits, our fishery requires some innovation in order to remain viable. We fully endorse this proposal.

Daniel Earle

SO4K59415P

Sandra Earle

SO4K61139R



Dear Board of Fish Members,

My name is Gabriel Edwards, a commercial set-net fisherman and permit holder on Kodiak Island. I was born in Kodiak and have lived there for most of my life. I come from a family of commercial fishermen and have fished out of Viekoda Bay, on the west side of Kodiak Island, for many years.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

The set-net fishery is a gear type of historic importance on Kodiak Island. Traditionally, the salmon resource was allocated in such a way that the different gear types at least had a fair shot at intercepting these fish. We would like that situation to continue, and as such I am writing in support of these proposals.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Gabriel Edwards



Submitted by: Jonathan Edwards

Community of Residence: Chiniak, Alaska

Comment:

Dear BOF,

I am a Kodiak Island setnet permit holder, and have been set netting on Uganik Island for 43 years. Uganik Island is on the west side of Kodiak Island. I have lived in Alaska for the last 44 years. I am totally opposed to splitting up the Central section of the Kodiak Salmon Management Area. The Central Section is one of only 2 areas where set netting is allowed in the Kodiak Island Management Area. To split this area up would be devastating for the Westside Kodiak Island set netters.

Thanks for your consideration in this matter,

Jonathan Edwards

Dear BOF,

I am a Kodiak Island set netter and have been set netting on the Westside of Kodiak Island for the last 43 years. I am opposed to proposals 72 and 73. I feel this would adversely affect Westside set netters and would allocate fish to the Kodiak Island seiners.

Thanks for your consideration with this matter,

Jonathan Edwards

Dear BOF,

I would like to comment on Proposal 62. I am a 44 year resident of Kodiak, Alaska. and have been set netting for salmon commercially on the Westside of Kodiak Island for the last 43 years. Set netting for salmon on the Westside of Kodiak Island is on a severe decline. This is not due to the lack of abundance of salmon. There are 2 main factors driving this decline. #1 is the efficiency of the seine fleet. When I started set netting, the average seines boat was about 40 foot, with about a 2-300 hp engine, with a seine skiff, powered by a 35-70 hp outboard. Seines were generally shallow, with relatively light lead lines compared to today. Now, boats are much larger, and the combined horsepower of the modern jet skiff and seine boats in the neighborhood of 1000 hp, or more. With the larger seines and very heavy lead lines, these are WAY more effective at scooping salmon than when I started set netting. Meanwhile, set nets haven't changed much. You put the net out, and fish run into them, period, end of story.

The #2 reason is fisheries management style. This is demonstrated by the data that shows that way more fish are being harvested in the terminus areas than has been in the past.

We desperately need more fishing time without seines in the water to remain relevant. and SOLVENT.

Thank you for your consideration in this matter,

Jonathan Edwards



December 26, 2023

Dear Board of Fisheries Members,

I'm a former fisheries biologist with ADF&G and I currently do data analytics for a healthcare organization. For over 20 years, I've also been a setnetter with my husband and, later, children, in Uganik Bay in Kodiak. Fishing is foundational to the structure of our family's life and rhythm. Watching my kids gain competence in core life skills by engaging in the fishery has been a joy. Raising children on the beach and sea while learning where their food and livelihoods come from is integral to our values.

Unfortunately, in recent years setnetting has become less and less of a financially sustainable part of our year. To make our household function, I now have to take leave from a "real" job to spend time at our family site instead of working seasonally for ADF&G. Each year we hire younger and less experienced crew because earning \$4,000 for three months of work isn't an offer that can compete with other opportunities. The financial difficulties are felt across the NW setnet fleet and are not just a matter of individual fishing choices or the vagaries of a poor season.

I applaud the efforts of the Board of the Northwest Setnetters Association and the members of the proposal committees, as well as individual community members, for thinking creatively and broadly about how to shore up our shrinking industry. When I first saw the proposal book, I wanted to be sure the magnitude of the problems justified the scope of the solutions being proposed. Looking at the data, I believe there is merit to the concepts behind all of the proposals that support NW setnetters – 62, 63, 64, 70, and 71. When I look at the percentage of the sockeye and pink harvests in the NW District and Inner and Outer Karluk Sections, the decline is persistent and significant, as shown in the graphs below.

Setnetters need time in the water. We can't fish longer or harder or in better locations. We adapt to changing conditions by buying new and different nets, trying different equipment for cleaning our gear, and doing more with less. But at the end of the day, we can only catch fish when we're allowed to have our gear in the water. As ecosystems, technology, and management have changed, we're being squeezed out. De facto changes to the allocation of the fishery are being made without regard to the long history of setnetting or the fact that we have no alternative fisheries resources.

On the other hand, Proposals 72, 72, and 74 from the Kodiak Seine Association and individual seiners, all would serve to continue the trend of increasing salmon catch allocation away from setnetters and towards the seine fleet. Proposal 74 would be especially damaging because many setnetters would sit idle while others would be corked off by the highly mobile seine fleet who have no minimum distance they must maintain from setnets.

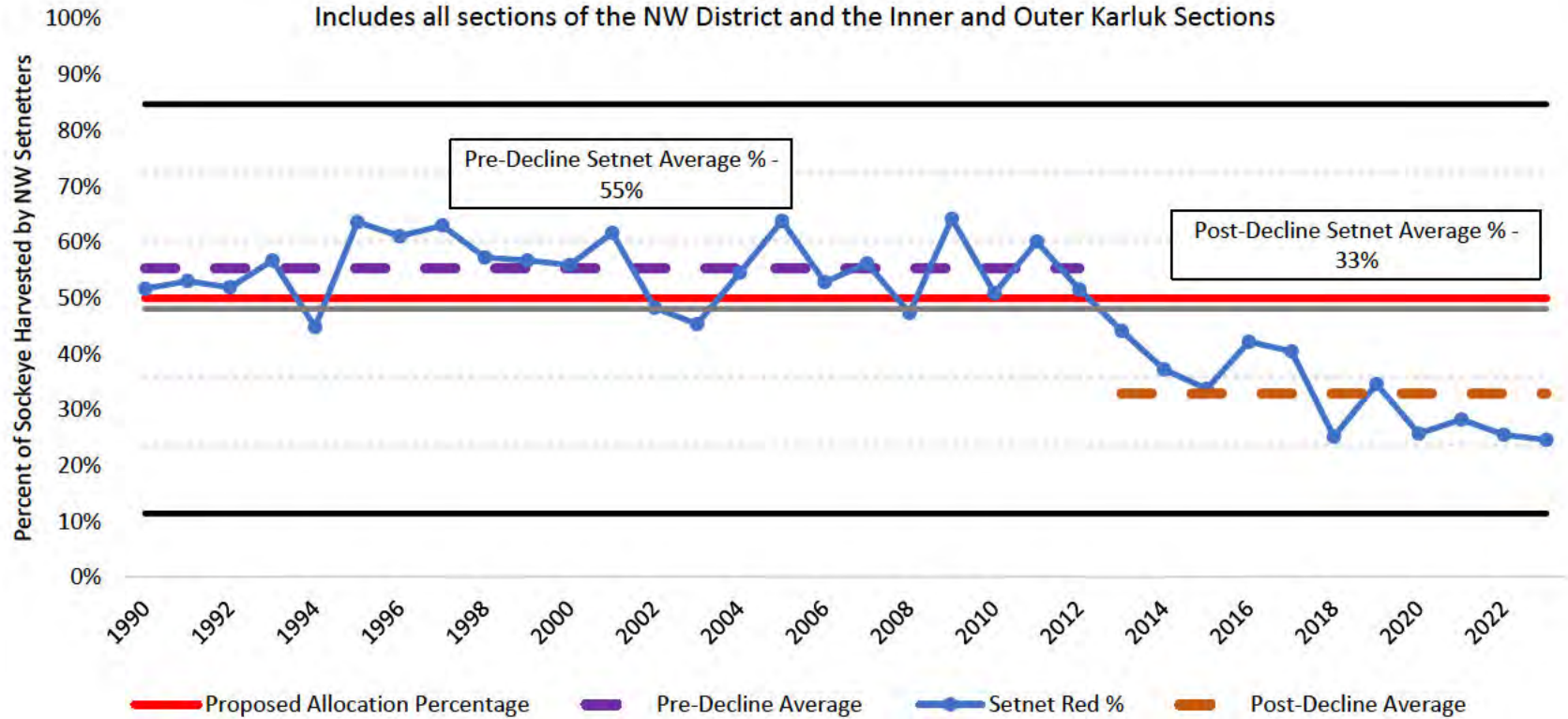
All Kodiak salmon fishermen are facing difficult times. Terrible market conditions impact everyone and I think we are all concerned about what the future holds. But even at this moment, it is essential to find ways to move forward and salvage our fishery without gutting anyone else's livelihood.

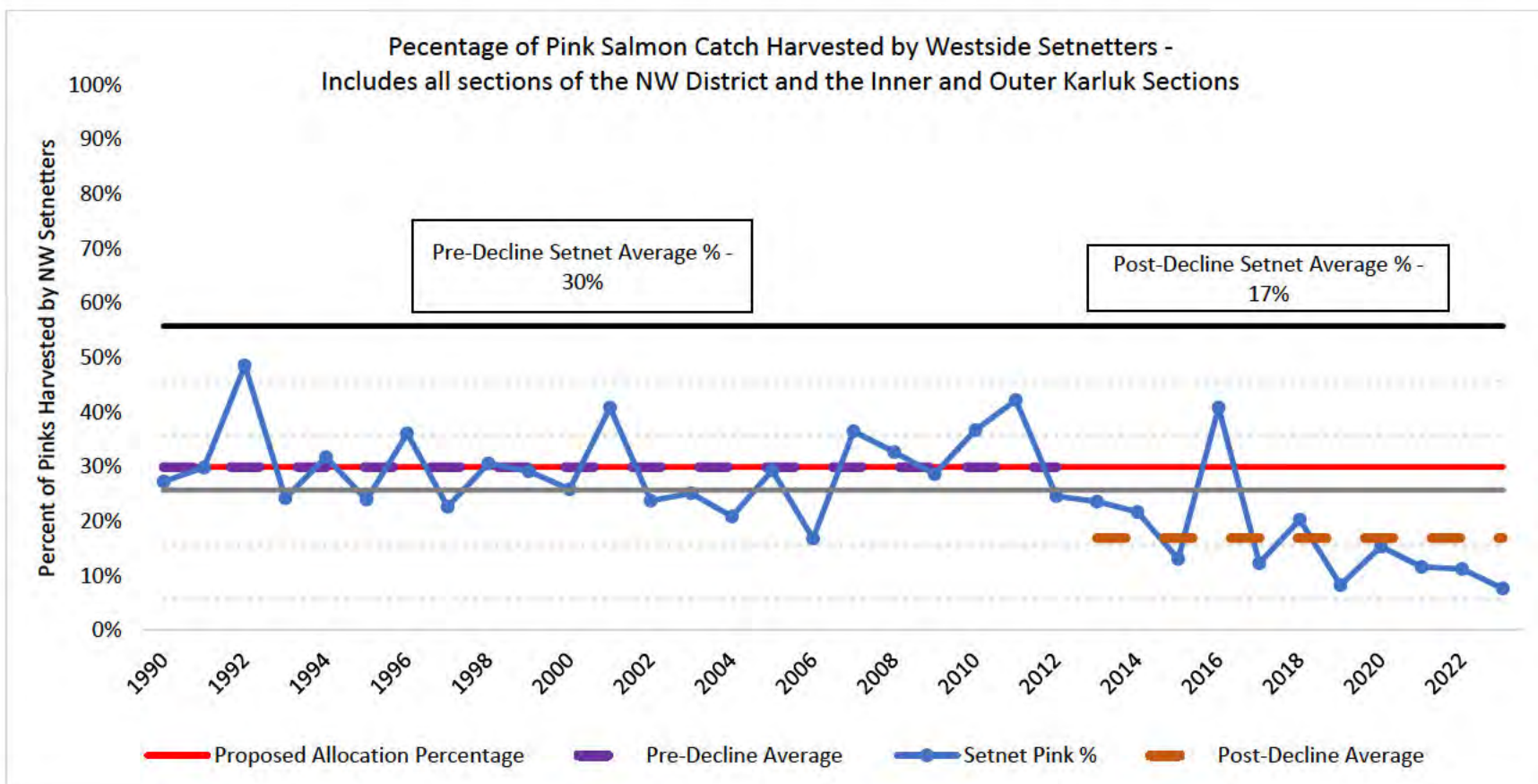
Thank you for your time and consideration in weighing these challenging issues.

Aaren Ellsworth



Percentage of Red Salmon Catch Harvested by Westside Setnetters -
Includes all sections of the NW District and the Inner and Outer Karluk Sections







Dear Board of Fish Members,

I appreciate your consideration of my comments related to this year's Kodiak area commercial finfish proposals. I have been fishing salmon in Kodiak since 1992 and have owned and operated a set gillnet site in Uganik Bay in the Northwest District since 1999.

As was recognized by the Kodiak Advisory Committee, Kodiak's Westside setnet fishery is struggling and efforts should be made to find workable solutions to support the set gillnet fleet. The Northwest Setnet Association has submitted a range of proposals to bring this issue to the table. Data clearly shows the decline in the percentage of catch in our gear type over time. It is a complex of factors that have led to the current situation, highlighted by significant changes in the environment, changed Karluk River escapement goals, and the increased catching power of the Kodiak purse seine fleet. Cause and effect can be hard to pin down in our dynamic mixed-stock fishery; however, the problem is real and we setnet fisherfolk need help.

One clear thing is that we setnetters are suffering the burden of environmental change. Due to the nature of our gear type, we can't move locations to chase fish if returning fish take a non-historic route, and we are dramatically impacted by increased annual algae blooms that dirty our nets. We fundamentally need more time and opportunity in the execution of our annual fishery to bring our catch to a level that will allow our gear type to survive.

I would like to voice strong support for proposals 62, 64, and 71 that were proposed by the Northwest Setnet Association. These proposals can be easily integrated into current management and have minimal impact on the execution of the fishery for other gear types.

I support proposal 70 because it shines a light on the decline of our gear type and is a launching point to shift the current framework for management such that it might help generate an increase in fishing time and the opportunity needed to help our setnet gear type survive into the future.

I oppose proposals 72, 73, and 74. These proposals all could harm setnet opportunity and catch, tipping the balance further against our gear type. Proposal 74 could be particularly harmful to the historic mixed stock westside setnet fishery, and although arguments will be made that it allows ADF&G managers more tools for protecting smaller systems, these tools are not needed because the department can already protect these systems by opening and closing the inner bay areas.

Thank you for your consideration and thoughtfulness.

Sincerely,

Bryan Ellsworth



Submitted by: Vasilian Fefelov

Community of Residence: Homer, Alaska

Comment:

I think it will be unfair for jiggers on proposal 54 because jiggers just start fishing around that time and if the pot boats take half the quota before jiggers start fishing seems unfair

Proposal 54: Oppose

Proposal 55: Support



Submitted by: Edwin Fisher

Community of Residence: Astoria, Or

Comment:

Permit stacking I support this proposal with it being sunsetted in three years to evaluate its effect on the fishery for the time it was in place.

Proposal 44: Oppose

Proposal 45: Oppose

Proposal 46: Support

Proposal 47: Support

Proposal 48: Support

Proposal 49: Oppose

Proposal 50: Support

Proposal 51: Support

Proposal 61: Oppose

Proposal 63: Support With Amendments

Proposal 64: Support

Proposal 65: Oppose

Proposal 66: Support

Proposal 67: Oppose

Proposal 68: Oppose

Proposal 70: Oppose

Proposal 73: Support



Submitted by: Esther Freeman

Community of Residence: San Diego, CA

Comment:

Dear Board of Fish Members,

I am a dear friend of someone who will be affected by the new proposals taking place. I live in San Diego, CA, and am connected to a fishery in Alaska.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Esther Freeman



Submitted by: Darin Gilman

Community of Residence: Cordova

Comment:

Proposal 59- Oppose

Proposal 59: Oppose



Submitted by: Leigh Gorman Thomet

Community of Residence: Kodiak

Comment:

For the upcoming January 2024 meeting in Kodiak.

To all BOF Members,

My name is Leigh Gorman Thomet. I've been a commercial fisher/mariner for 40 yrs.

With my family, I have owned and operated a setnet site on Kodiak Island for 33 yrs. For the past 3 years I have not fished my site due to the loss of my husband in 2019. Currently my site is for sale.

I strongly oppose Proposal 63: permit stacking for the Kodiak Setnet Fleet.

Even though I would BENEFIT from permit stacking I believe it is not a healthy choice for ANY of Alaska's salmon fisheries without first having an Optimum Permit Study conducted (like that conducted by Gunnar Knapp- retired Professor of Economics at UAA Institute of Social and Economic Research for the Bristol Bay Fishery) for these reasons:

1. Permit stacking is not about me and my personal hardship and shouldn't be changed due to the current low prices, salmon returns, climate change, gear conflicts and so forth. Those issues have always been a given and fishermen have always adjusted (or not) to these conditions. For as long as the salmon fisheries have been around the salmon runs have fluctuated and so have the markets-there are no guarantees with fishing and we should not expect them to be so.

The origin of permit stacking was from the enabling legislation of HB 286 in 2002 and HB 251 in 2005. These bills were introduced to consolidate fisheries suffering from large numbers of underutilized permits and an excess of harvesting capacity (like that of Bristol Bay at the time) as stated by the bill's sponsors.

2. There are approximately 188 setnet permits for the Kodiak district. If permit stacking is allowed, eventually only 94 permit holders will conduct this fishery.

-How many of those will be out of state residents with ownership? What will the consequences be?

- What impact will this have on the economic engine that is part of Kodiak's economy when participation is cut in half?

- The Kodiak seine fleet has asked for permit stacking in the past and it was denied. Bristol Bay has asked for permit stacking in previous Board cycles even though that fishery has benefited from dual permit boats.

-What impact will permit stacking have on the state's economy if stacking is allowed throughout Alaska's salmon fisheries?

-What will become of Alaska's coastal communities?

Fishermen have and will continue to ask for Permit stacking not fully understanding what it is intended for and its origin. From my observations over the past 40 years, some don't care.

3. Alaska's fisheries employ the most people over any other sector of our economy, like mining, oil, timber, etc. What will be the UNINTENDED consequences from substantially less participants?

4. Do not allow permit stacking without an optimum permit study conducted to validate the need. Period.

5. I believe the non residency of a proposer should be taken into careful consideration by the board when enormous changes to Alaska's fisheries are being sought.

It is my hope that you, the BOF members, would adopt the restructuring criteria (like that of permit stacking) that would have to be utilized before such proposals are even considered, such as those in the Alaska Board of Fisheries- Restructuring Proposal Forms in the link below:

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/forms/rest-prop-form.pdf>

It is also my hope that the BOF members understand the monumental change of such implementations, the history behind permit stacking, its intent, and the unforeseen consequences that may occur.

I will continue to reside in Kodiak. I love our unique community. I care greatly about Alaska's fisheries, the direction they're going, who is allowed to fish them and will remain proactive in some capacity in upholding them.

Impact, prescience and accountability are significant words when major change is at hand.

Please consider all of them.

I wish you all the best with your calculated decision making.

Leigh Gorman Thomet

Proposal 63: Oppose



PC42

Submitted by: Leigh Gorman Thomet

Community of Residence: Kodiak

Comment:

For the upcoming January 2024 meeting in Kodiak.

To all BOF Members,

My name is Leigh Gorman Thomet. I've been a commercial fisher/mariner for 40 yrs.

With my family, I have owned and operated a setnet site on Kodiak Island for 33 yrs. For the past 3 years I have not fished my site due to the loss of my husband in 2019. Currently my site is for sale.

I strongly oppose Proposal 63: permit stacking for the Kodiak Setnet Fleet.

Even though I would BENEFIT from permit stacking I believe it is not a healthy choice for ANY of Alaska's salmon fisheries without first having an Optimum Permit Study conducted (like that conducted by Gunnar Knapp- retired Professor of Economics at UAA Institute of Social and Economic Research for the Bristol Bay Fishery) for these reasons:

1. Permit stacking is not about me and my personal hardship and shouldn't be changed due to the current low prices, salmon returns, climate change, gear conflicts and so forth. Those issues have always been a given and fishermen have always adjusted (or not) to these conditions. For as long as the salmon fisheries have been around the salmon runs have fluctuated and so have the markets-there are no guarantees with fishing and we should not expect them to be so.

The origin of permit stacking was from the enabling legislation of HB 286 in 2002 and HB 251 in 2005. These bills were introduced to consolidate fisheries suffering from large numbers of underutilized permits and an excess of harvesting capacity (like that of Bristol Bay at the time) as stated by the bill's sponsors.

2. There are approximately 188 setnet permits for the Kodiak district. If permit stacking is allowed, eventually only 94 permit holders will conduct this fishery.

-How many of those will be out of state residents with ownership? What will the consequences be?

- What impact will this have on the economic engine that is part of Kodiak's economy when participation is cut in half?

- The Kodiak seine fleet has asked for permit stacking in the past and it was denied. Bristol Bay has asked for permit stacking in previous Board cycles even though that fishery has benefited from dual permit boats.

-What impact will permit stacking have on the state's economy if stacking is allowed throughout Alaska's salmon fisheries?

-What will become of Alaska's coastal communities?

Fishermen have and will continue to ask for Permit stacking not fully understanding what it is intended for and its origin. From my observations over the past 40 years, some don't care.

3. Alaska's fisheries employ the most people over any other sector of our economy, like mining, oil, timber, etc. What will be the UNINTENDED consequences from substantially less participants?

4. Do not allow permit stacking without an optimum permit study conducted to validate the need. Period.

5. I believe the non residency of a proposer should be taken into careful consideration by the board when enormous changes to Alaska's fisheries are being sought.

It is my hope that you, the BOF members, would adopt the restructuring criteria (like that of permit stacking) that would have to be utilized before such proposals are even considered, such as those in the Alaska Board of Fisheries- Restructuring Proposal Forms in the link below:

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/forms/rest-prop-form.pdf>

It is also my hope that the BOF members understand the monumental change of such implementations, the history behind permit stacking, its intent, and the unforeseen consequences that may occur.

I will continue to reside in Kodiak. I love our unique community. I care greatly about Alaska's fisheries, the direction they're going, who is allowed to fish them and will remain proactive in some capacity in upholding them.

Impact, prescience and accountability are significant words when major change is at hand.

Please consider all of them.

I wish you all the best with your calculated decision making.

Leigh Gorman Thomet

Proposal 63: Oppose



Comments to proposal 57

I am opposed to this proposal. The sac roe herring and food/bait herring fisheries have been managed separately since the 1970's. I have been involved in the food/bait herring fishery in Kodiak since 1980. The Fish and Game Department has always had strict management guidelines regarding the food/bait fishery. In my opinion, the fishery is well managed allowing optimal harvest each season without detriment to the sac roe fishery.

In the early 1980's the food/bait harvest had a 100 ton harvest guideline for the island. Whenever a harvest was put onboard the harvester was required to contact F&G via single side band radio as to amount and area. As the stocks increased and F&G was comfortable overharvest could be avoided, the quota increased to 200 tons annually. In 1988, F&G proposed to the BoF that of the 20% guideline harvest level for Kodiak herring 2% would be allocated to food/bait and 18% would be allocated to sac roe. This proposal passed unanimously.

Further adjustments were made to the management policies with the 1992 Kamishak district herring management plan and again in 1993 with more defining strategies including allowing longer and deeper purse seines. This change in gear restrictions of purse seines changed the fishery from months long manageable to an unmanageable fleet of purse seiners, overharvests, and eventually the closure of the fishery early in 1998 and completely in 1999 and 2000. The fishery was not reopened until limited entry was established and guidelines established that require the entire fishery be a co-op with only one vessel being allowed to harvest at a time. Due to the required management policies this co-op has worked out well. There has not been an area that has suffered overharvest since implementation.

The manageable/unmanageable aspect of this fishery cannot be overstated. The harvest and prosecution of the fishery is totally dependent on market conditions. Nearly all the harvest is typically used as bait for the crab, cod, and longline fisheries. For the decades I have been involved in the fishery, samples have been sent out to herring food processors to try and gain additional markets. This has been unsuccessful, mainly due to the high cost of catching, processing, and shipping compared to their existing sources. As a bait product, the Kodiak herring has earned its' niche however the market is only so big. A large increase in quota would not necessarily equate to increased harvest. If increased quota and harvest capabilities were to happen, there is already a limited entry permitted fleet in place that could be implemented. The decision to use only one vessel is a F&G requirement, in order to stop the dumping and wastage of resource the last time an unrestricted fleet of purse seiners entered the fishery.

This fishery is already under limited entry management. Both trawl and seine permits coexist. By comingling the sac roe fishery with the food/bait fishery, participants would be allowed in fisheries they did not qualify for. Trawlers are acceptable in the food/bait fishery but would have quality concerns in the sac roe fishery. An increased number of deep seines has already proved detrimental to management policies in the food/bait fishery. For these reasons I ask the BoF to deny this proposal.

Sincerely,

Mike Haggren



Dear Board of Fish

Thank you for your time and work around the state making hard decisions on our commercial and sport resources.

My name is Jamin Hall I first arrived in Kodiak in 2005 in my early 20's to work at a set net site in Uganik Bay for the summer salmon season. I made friends and grew to love the fishery and the area and continued to return summer after summer. I met my future wife, Naomi, who grew up set netting in Uganik with her parents and sister. In 2011 I started participating in other fisheries and staying in Kodiak year round. In 2014 I had the opportunity to purchase a friends' site in Uganik and become a permit holder; invested in the fishery. I fished the site with my brother for a couple years before, and a couple years after Naomi and I had our first son. We now own and run the site together, with our two boys who are third generation setnetters in Uganik Bay.

I do not expect to make enough setnetting to live on year round; initially, after buying my site I fished pot cod, halibut, and tanner crab as crew in the off season, and now I work a variety of jobs in town to support my family. Unfortunately, in the last 5-6 years I can barely even afford to spend the 3-4 months participating in this fishery that used to be fully capable of supporting families year-round. I fear both for my family, and for future generations that this way of life is going to become economically unviable and will go extinct. This fishery is in dire need of support through changes in regulation that allow us, as a fishery, to catch more salmon.

I am in support of the proposals 62, 64, 70, and 71 submitted by the Northwest Setnetters Association. These are all proposals which will help our ailing fishery; hopefully averting it's extinction and our way of life. If we do not get any help we will continue to see diminishing catches and I will not be able to continue this tradition with my family. As it stands now I cannot in good conscience hire crew without telling them that they might not make any money. Most of my crew for the last 4-5 years I have paid far more than a standard crew share of 10% because I couldn't stomach sending them home with nothing. This comes out of my own pocket and I just can't afford it.

I oppose proposals 72, 73, 74. These are harmful to set netters at a time when we need help.

Thank you for your time and consideration,

Jamin Hall



Submitted by: Naomi Hall

Community of Residence: Kodiak, AK

Comment:

My name is Naomi Hall and I am a Kodiak setnet permit holder since 2018, fishing in Uganik Bay since 1991. I am a second generation setnetter, raising third generation setnetters, who love to go fishing.

I am writing in support of proposals 62, 64, and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

My parents raised my sister and I setnetting and I have fond memories of fishing each summer. I fished my way through college each summer; however, with recent fishing trends I have no idea how I did that. The way things have been trending I don't know how much longer we can continue setnetting when our business is either barely breaking even or losing money. The time, effort and energy involved to just try and make setnetting a viable business for us just hasn't been penciling out.

I am also opposed to proposals 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Naomi Hall

Proposal 62: Support
Proposal 73: Oppose

Proposal 64: Support
Proposal 74: Oppose

Proposal 71: Support

Proposal 72: Oppose



Submitted by: Adam Haughey

Community of Residence: DURANGO

Comment:

Proposal 62: I strongly believe this proposal should be ADOPTED to allow a more even distribution of the sockeye and pink salmon throughout the fleet.

Proposal 64: I strongly believe this proposal should be ADOPTED to allow better efficiency of each set gillnet.

Proposal 70: I strongly believe this proposal should be ADOPTED in order to allocate salmon catch more fairly and more consistent with historical catch levels.

Proposal 71: I strongly believe this proposal should be ADOPTED as to protect fragile sockeye and chinook returns to the Karluk river system.

Proposal 66: I strongly believe this proposal should be REJECTED because this would simply lengthen a seign by 50 fathoms and increase an unfair advantage to the seign fleet and further disadvantage the set gillnet fisheries.

Proposal 72&73: I strongly believe these proposals should be REJECTED because they would allow intercept of fish traveling to the central section of the Northwest Kodiak district and adversely affect fishing time in this area.

Proposal 74: I strongly believe this proposal should be REJECTED due to the severe adverse effect it would have on the central section of the NW district and would concentrate fishing in much smaller areas.

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



PC47

Submitted by: Claire Haughey

Community of Residence: Larsen Bay, Alaska

Comment:

Dear Board of Fish,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since I was born in 2001 for my families multigenerational set net business. I have lived on Kodiak Island every summer of my life.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Claire Marguerite Haughey

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



Submitted by: Lauren Haughey

Community of Residence: Uvalde, TX

Comment:

Dear Board of Fish Members,

My name is Lauren Haughey a third generation commercial Salmon setnetter in Uyak bay. I have worked in my families setnet operation located in Uyak bay since I was a little girl

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I have grown-up, watching my grandfather, run the operation and then my father. When I was a baby, my parents would take me out while they were fishing and put me in the totes full of fish while they worked. I think that is where my love for set netting started. I remember always wanting to get better at picking and learn more about the fishery that had been in my family for now 60 years. At the age of 13 I became full-time crew, and at the age of 17 started running my own skiff. I have had the privilege of growing up working with my two older sisters, my younger brother and my parents. These shared experiences working together, have built a deep bond and connection between my family as we work hard to provide nutritious food for the world.

Most teenage girls spend their summers at summer camp or hanging with friends, but I have been blessed with getting to spend my summers on the water working hard and with my family. I can say with certainty that setnetting is something that I want to do for the rest of my life and something that I want my kids to have the option to experience. The way things have been going the past few years it is realistic to imagine a future where is that netting no longer exists, because one cannot financially support themselves in the business. Additionally, the decline of the runs in recent years places an added stress on the industry. It's a hard realization to come to that the one thing that you love most in the world and feel called to might not be around forever. I don't know where I would be, or the person that I would be without set netting, and I hope that I never have to find that out.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Lauren Haughey

- | | | | |
|--------------------------------------|----------------------|----------------------|----------------------|
| Proposal 44: Support With Amendments | Proposal 45: Oppose | | |
| Proposal 46: Support With Amendments | Proposal 47: Oppose | Proposal 48: Oppose | |
| Proposal 49: Support With Amendments | Proposal 50: Oppose | | |
| Proposal 51: Support With Amendments | Proposal 52: Oppose | Proposal 53: Oppose | |
| Proposal 54: Support | Proposal 55: Oppose | Proposal 56: Oppose | |
| Proposal 57: Oppose | Proposal 58: Oppose | Proposal 60: Oppose | |
| Proposal 61: Oppose | Proposal 62: Support | Proposal 63: Oppose | Proposal 64: Support |
| Proposal 65: Oppose | Proposal 66: Oppose | Proposal 67: Oppose | Proposal 68: Oppose |
| Proposal 69: Oppose | Proposal 70: Support | Proposal 71: Support | Proposal 72: Oppose |
| Proposal 73: Oppose | Proposal 74: Oppose | | |
-



Submitted by: Quinn Haughey

Community of Residence: San Diego, California

Comment:

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Uyak bay since 1997. My family has been fishing Uyak bay since 1965.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Quinn Haughey

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



Submitted by: Rebecca Haughey

Community of Residence: Uvalde, Texas

Comment:

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since 1993. I live in Uvalde, Texas in the winters. Although we migrate every year, my kids have attended the village school in Larsen Bay and spent up to six months out of the year every year in Alaska. Sometimes it feels like there is bias against me, because I am not an Alaskan resident, however, what I do bring to the table is extensive experience in agriculture in the lower 48 as a rancher, and residing in an agriculture community that also is big on hunting and tourism, as well, as an economy that heavily relies on oil. This is very similar to Alaska. What I have is a little glimpse into the future as many of the things that are occurring in Alaska now occurred in Texas 20 to 30 years ago as I was growing up. As I'm sure everyone knows, it is so much easier to write policy that affects change if it is proactive rather than reactive. We are a little late in the game on this, but it is crucial that we act now.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic

harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

The loss of harvest for my family follows the trends that have been discussed. Financially, it is devastating, and we have had to reinvent ourselves somewhat. My kids want to continue the family fishing business that has been a part of our family for three generations started by my father-in-law in 1965. The precedence has been set in other areas in the state. Alaska values set netting and small, family businesses. It is what the entire state built it's economy on before big oil came in and continues to be necessary for the state to thrive.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing. If you look historically at England, Ireland, Scandinavia, the Mediterranean, the East Coast and the West Coast of the United States as well, overfishing was preceded by technological advances in maritime industries that allowed greater harvest by single vessels. If you track the advances in the seine fleet, you will also find that it now employees fewer fishermen, and the majority of the fish is caught by a much smaller percentage of Vessels and crewmen. These advances left unchecked eventually led to overfishing and unemployment and has been seen historically in all the aforementioned places as well. It's not that we need to hang on when it's time to become obsolete, but I think there is a point where the board of fish has to decide what the priorities of the state will be. In addition, I oppose 57 as it sets a bad precedence to null and void limited entry permits that have been purchased. I support the development of food herring and see that it possibly needs to be split from bait herring to allow development, but not fished as this proposal suggests.

I completely understand and support all of the salmon fisherman. I am friends with seiners and setnetters alike. That makes the situation very difficult as we all truly want to do our jobs, and make a living and we hope that we all have success. But I strongly caution the board not to lean in the direction of big agriculture. It is devastating to small towns. I have experienced it firsthand in the lower 48. Alaska is about the only place left where small family businesses in agriculture can potentially thrive and this is being threatened by so many factors. We can't even really figure it out. Please do your best to support setnetting and make seining viable for all boatowners, not just the megaboats.

Thank you for your consideration.

Sincerely,

Rebecca Haughey

Proposal 57: Oppose
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



PC51

Submitted by: Sam Haughey

Community of Residence: Larsen Bay,AK. May - September, Uvalde,TX October - April

Comment:

Dear Board of Fish Members,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since 1965. I have spent every summer of my entire life on Kodiak Island, in Uyak Bay, at our setnet site. My children are third generation setnetters. Without your

support of proposals 62,64,70, and 71, I am afraid we will not have a viable monetary fishery to hand down to another generation. This fishery is not only about “monetary needs”. This fishery provides so much more than money. It is primarily family based, with everyone pulling their weight to bring in the season’s catch. From young children doing chores around camp and sorting salmon species into the correct totes to the older children and young adults working on solar systems and outboard motors. Set netting is not just an occupation, it’s “A Way of Life”!

Sincerely, Sam W. Haughey

SO4K 57559

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



PC52

Submitted by: Samuel Haughey

Community of Residence: Uvalde, TEXAS

Comment:

Dear Board of Fish Members,

I am a Kodiak Setnet permit holder, fishing in Larsen Bay, AK since I was born in 2006. I live in Texas in the winters and fly up every summer to work the whole set net fishing season.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association.

Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentaget the point where the fishery is in danger of not being viable anymore.

These proposals aim to reverse that trend.

Thank you for your consideration.

Sincerely,

Samuel Haughey Jr.

Proposal 62: Support
Proposal 71: Support

Proposal 64: Support
Proposal 72: Oppose

Proposal 66: Oppose
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose



Submitted by: David Hilty

Community of Residence: Kodiak Alaska

Comment:

Oppose proposal 65.

Throughout the last 37 years of fish spotting in Kodiak I have seen many ebbs and flows in the Kodiak salmon fishery, from highs and lows of harvests, prices and fisherman participation.

I grew up as a young Kodiak fisherman and later changed my career path into aviation. I was able to merge both of my skills to become a fish spotter. Salmon spotting is one of very few ways that an entry level pilot can build Alaska flying time in order to enter a commercial career in aviation. Unlike herring fishing, where most fishers use a pilot, Kodiak salmon spotters are rare. The Kodiak salmon area has seen a high of maybe 5 spotter pilots and in most recent years only one, being myself and a couple of part time and private (hobby) spotters. There are very few boats that choose to use spotters in Kodiak, so the net effect on the fleet is minimal.

The Kodiak management area is comprised of hundreds, if not thousands, of miles of shoreline and hundreds of anadromous streams, along with many different salmon species, genetic stocks and run timings that span nearly 5 months. Within the Kodiak management area we have seen areas open fishing for as little as 6 hours by emergency order to as long as 90 days when the run and escapement are strong. It would be nearly impossible for a fishing vessel that travels at 8 knots to be able to compile current and relevant information needed to make decisions as where to be the most efficient during the fishing period. (should I run to the hatchery for a 6 hr opener or stay on the south end to grind away on slow but steady fishing?) That is where a spotter is able to help fishermen make a good decision to save critical fishing time or to burn \$4.50 a gallon fuel to move to better grounds. A good fish spotter is a tool used to gather information about run timing. More times than not, I am recommending that the boats do not go to a new area because the run hasn't materialized there yet or that there are already boats there. It takes many years of experience to make sound decisions to recommend a move. In my opinion, a bad fish spotter is one that looks for fishermen on capes and circles over them until they roll their fish aboard and relays the information to their boats. This is bad etiquette, unprofessional and one of the main reasons that fishermen are against spotters. I make a point of informing beginners and new spotters to the area that these actions are the best way to get spotting banned in Kodiak.

From the first of July until the middle of September I am in the air almost every day flying for my boats, or contracting with the Kodiak area fish managers to do salmon escapement counts and fishing effort surveys, or the Alaska department of game doing animal surveys. If spotting is banned in Kodiak I may be forced to justify and defend my activities to enforcement in open fishing areas where my other activities overlap. Someone may claim that I am spotting when in fact I am transitioning over open fishing grounds while doing stream surveys, or possibly flying a medi-vac.

Kodiak has been my home for over 45 years, I have a lot of relationships within the community of which I try to give back. On many occasions I have delivered parts, searched for lost skiffs and nets, performed search and rescues and flown injured people to town. Many of these situations were for people and boats that I have no financial affiliation with, its the fact that I am in the area, in the air and available to help. Because of my vast experience of the salmon runs on Kodiak, I serve on the local aquaculture association board. I also relay pertinent information to the fish managers regarding fish escapements during my daily flights without financial gain. I believe that this information is of great value to the state especially during times of budget cuts where

they can't afford as many survey flights as they would like. These services would all go away if spotting is banned in Kodiak.

In closing a spotter is just another tool to make a fisherman more efficient. No one complains when a fishing competitor gets a bigger power skiff, deeper net, secret radio, or good pair of binoculars. Everyone has the opportunity to use their tools of choice. If spotters are banned, what is next? Will there be a proposal for limiting boat or skiff horse power, banning is a slippery slope.

If you vote to pass proposal you will effectively end my 37 year career as a spotter and one who lives and gives back to our community.

Proposal 65: Oppose



PC54

Submitted by: Dennis Hintz

Community of Residence: Kodiak, AK

Comment:

I am a 47 year old father of 2, and I've been fishing in Kodiak since 1988, when I started my career as a setnetter before transitioning to seining in 1992. I currently operate the fishing vessel Cami O as a seiner in Kodiak, and earn the majority of my income from salmon fishing. I also work as a welder in the winter, and a substantial portion of my work comes from the salmon fleet. Proposals 62 and 70 would harm my business both on and off the water. Requiring 48-hour seine closures would hurt the seiners far more than it would help the setnetters, and would just mean less fish caught in Kodiak. This is a waste of the resource.

The allocation plan in proposal 72 is ridiculous. How do you allocated fish to a gear type that isn't able to catch the fish?

I also used to live in Port Lions, which is a village in the Central section. Fishermen from Port Lion spend most of their time fishing close to home, and this would have a particularly bad impact on that community.

I'm also opposed to proposals 67 and 68. These escapement goals are arbitrary, and 68 would result in over-escapement of the Karluk system and a collapse of the run.

As a welder and seiner I see how important fishing access is to the entire Kodiak economy. Please do not pass proposals that will result in overall less fishing income for our community, because that impacts everyone in Kodiak, on and off the water.

Proposal 60: Support

Proposal 62: Oppose

Proposal 67: Oppose

Proposal 68: Oppose

Proposal 70: Oppose

Proposal 72: Support

Proposal 73: Support



PC55

Submitted by: Aaron Hocum

Community of Residence: Kodiak, Alaska

Comment:

Object Proposal Number 49 - a group from outside a management area should not submit a proposal that is not based on scientific evidence. Management areas are separate for a reason, and because one area has regulations in place, it does not mean their regulations will work in another area.

Proposal 44: Oppose
Proposal 48: Support

Proposal 45: Oppose
Proposal 49: Oppose

Proposal 46: Support
Proposal 50: Oppose

Proposal 47: Support
Proposal 51: Support



PC56

Submitted by: Anders Hocum

Community of Residence: Kodiak, Alaska

Comment:

Object Proposal Number 49 - a group from outside a management area should not submit a proposal that is not based on scientific evidence.

Proposal 44: Oppose
Proposal 48: Support

Proposal 45: Oppose
Proposal 49: Oppose

Proposal 46: Support
Proposal 50: Oppose

Proposal 47: Support
Proposal 51: Support



PC57

Submitted by: Tamara Hocum

Community of Residence: Kodiak, AK

Comment:

Object Proposal Number 49 - a group from outside a management area should not submit a proposal that is not based on scientific evidence.

Proposal 44: Oppose
Proposal 48: Support

Proposal 45: Oppose
Proposal 49: Oppose

Proposal 46: Support
Proposal 50: Oppose

Proposal 47: Support
Proposal 51: Support



Submitted by: Timothy Hocum

Community of Residence: Kodiak, Alaska

Comment:

Object to proposal 49. Additionally a group from another management area should not submit proposals without scientific/biology evidence as to the benefit.

Proposal 44: Oppose
Proposal 48: Support

Proposal 45: Oppose
Proposal 49: Oppose

Proposal 46: Support
Proposal 50: Oppose

Proposal 47: Support
Proposal 51: Support



Submitted by: Nicholas Hoffman

Community of Residence: Kodiak, Alaska

Comment:

proposal 74 Support

I've been fishing Kodiak Island for many years and since about 2016 I've seen a big decrease in the amount of fish returning to the inner bays of the central section of the west side of the island. Yes, Karluk River has had some big returns but not the many other salmon streams that make up the central section. It's just too big of a section to manage and needs to be broken up into smaller sections to better manage for local stocks. I would really like to see all the streams of the west side of Kodiak full of fish again and allowing each bay to open or close based on fish returning to that bay would be a great start to rebuilding the west side streams. This proposal gives managers more options for better management on the west side of Kodiak.

Proposal 74: Support

proposal 72 and 73 Support

proposal 72 to open the SW Afognak section concurrent with the central section on even years is a good way to spread the seine fleet out by opening up more of the coast on the west side. proposal 73 is fixing a big oversight in the management plan to allow the fish returning to the Sturgeon River to be used in management decisions on opening or closing that section instead of basing everything on Karluk.

Proposal 72: Support

Proposal 73: Support

proposal 70 Oppose

Set nets and seiners are different. It's misguided to just allocate 50% to each group. This proposal is flawed in so many ways. Set nets fish farther up in bays anchored in one spot and never move and usually only go out and check their nets 2-3 times per day. By contrast seiners are out making many sets a day and if the fish slow down in an area, they will usually drive to another area to look for better fishing.

In addition, the math used here is inaccurate, they are comparing set net catch numbers in the central section with seine catch numbers all down the west side in many areas where there aren't any set nets. A 30% allocation of pinks is also ridiculous because most set nets use a larger mesh size meant for catching only large reds, pinks just swim through these nets and are not caught. I've seined Kodiak for many years and fished the central section a lot and if this proposal passes, I'm afraid it might put me out of business because there would be long closures on the west side to allow the set nets to "catch up" with their salmon catch.

Proposal 70: Oppose



Submitted by: Nicholas Hoffman

Community of Residence: Kodiak, Alaska

Comment:

proposal 69 Oppose

This proposal disregards all the longstanding science fisheries regulators have used to reach escapement goals just to keeps set nets in the water longer. Having 105 hour guaranteed openers for set nets every week even if the salmon run is looking weak or isn't meeting goals is a bad idea.

Proposal 69: Oppose

Proposal 67 & 68

Oppose

Silver salmon run later in the year than red salmon and pinks, limiting the Fish and Game managers ability to open the Inner Ayakulik and the Inner Karluk sections to harvest pinks and late run reds in August and could lead to over-escapement and underutilized fish stocks. Not allowing Fish and Game managers flexibility to open the Inner Ayakulik and Inner Karluk sections in late August to harvest surplus pinks on a year with a large run would be detrimental to the health of the fishery.

Proposal 67: Oppose

Proposal 68: Oppose

proposal 66 Support

Kodiak is the last place in the state to use "Leads" or 7" web on the last 50 fathoms of the seine net. This is a relic of the past when leads were removable and there were worries of creek robbing this is no longer an issue. allowing seines to be made of the same web for the whole length makes it easier to work on them and normal seine web is much more available than 7" lead web if you ever need to replace part of your net.

Proposal 66: Support

proposal 64

Oppose

Increasing the allowable size of a set nets hook would make it in practice a fish trap. Fish traps were made illegal in Alaska in 1960 and we cannot allow them to re appear.

Proposal 64: Oppose



PC59

Submitted by: Nicholas Hoffman

Community of Residence: Kodiak Alaska

Comment:

proposal 57 Support

This proposal is a great idea to spread out the herring harvest between spring roe fishery and a fall food fishery. The price paid for herring by processors has declined a lot over the years because there is less demand for herring roe in the world. Splitting up the herring quota to give processors more options for selling it for the best price would be a much better utilization of the herring resource.

Proposal 57: Support



PC60

Submitted by: Iver Holm

Community of Residence: Kodiak Alaska

Comment:

Hi,

My name is Iver Holm i own and operate a commercial seine/pot/jig vessel in the Kodiak management area. I am a 3rd generation Alaska fishermen i grew up set gill netting on the westside of Kodiak island at my mothers set net site in Uganik Bay and spent many days seining with my father on his vessel. I strongly oppose proposal 62 and proposal 70 I don't see a viable mechanism that would allow a set allocation of fish to a single gear type that wouldn't result in the over escapement of many salmon systems. I am in support of permit stacking for set gill net fishermen, it would allow them a better fishing opportunity with the many dormant permits available.

Proposal 52: Support
Proposal 62: Oppose
Proposal 67: Oppose
Proposal 71: Oppose

Proposal 55: Support
Proposal 63: Support
Proposal 68: Oppose
Proposal 72: Support

Proposal 57: Support
Proposal 64: Support
Proposal 69: Oppose
Proposal 73: Support

Proposal 60: Support
Proposal 66: Support
Proposal 70: Oppose
Proposal 74: Oppose



PC61

Submitted by: Oliver Holm

Community of Residence: Kodiak, Alaska

Comment:

I support adoption of proposal#72. In the last Kodiak board cycle, the central and North Cape section management plan was modified to include "or based on pink salmon returning to the Karluk system". The SW

Afognak section was left out of the change. Ever since the west side management plan was adopted the Sw Afognak section had been managed with openings coinciding with the central and North Cape sections. Unless the SW Afognak section is included in the change, it could be closed for poor returns to the NW Kodiak district while the central and North Cape sections in the NW Kodiak district are open for Karluk pinks. This would be absurd and in contravention of "It is the intent of the board that salmon bound for these systems be harvested to the extent possible by the traditional fisheries located in all 17 sections" as stated in the adopting language of the Westside Kodiak Salmon Management Plan.

I support the adoption of proposal # 66 which would allow the use of normal seine web for sewn on leads instead of 7" web. The fish catching benefit would be minimal but the convenience in constructing and maintaining a seine would be significant with just one mesh size to deal with. Some set netters object but they got the use of monofilament web to increase their efficiency recently.

I am opposed to proposals 67,69,70,71, and 74. These proposals would have significant impact on the management of west side salmon stocks and would be contrary to the intent of the west side management plan. I do support proposal 73 that would modify management of the Sturgeon River section on even years from July 16th through August 15th to include managing for Sturgeon pinks as well as Karluk salmon {pinks and sockeye} as modified by the Kodiak AC.

My general comments on the push by NW set netters Assoc. to use the regulatory proposal to increase their catches in the west side: there are fewer set netters fishing and many are fishing for less of the season. This has happened in my family as my wife has recently only fished a few days a year just to maintain her KNW refuge cabin permit. One of my daughters had also set netted and still has her permit but has not fished for several years as she pursues advancement in her dental career. It is possible that other family members may want to fish the site but it is looking less likely. Several of the outside set net sites between Uyak and Uganik have been abandoned due to the rough weather and the depredations of sea lions. Some of these sites were quite productive but tough to fish. Some set netters have been attracted to the Bristol Bay fishery and only set net in Kodiak after the Bay fishery is over. In the time period that the NW set netters use as their goal for "their share", the early run to Karluk was strong resulting in long openings in the central section where they fish. Recently the early run has been weaker and the late Karluk run has been strong and running later. Many of the set net operations are closed up early in the late run. Many seiners are also done early too but a small segment of the seine fleet has harvested the very late fish. What is the logic that fish caught by a small segment of the seine fleet after most set netters have quit due to school, winter jobs, or closed markets should result in the entire seine fleet being penalized in June, July and August?

I am a probably retired 76 year old Kodiak seine permit holder. My son and son in law are active seiners. While some high liners in the seine fleet are doing well, there are many lesser producers having a hard time getting by. The drop in prices and a poor return expected for pinks will put more seiners out of business this coming year. Already about half of the seine fleet that was active in the eighties has fallen out of the fishery.

Some of the proposals put in by set netters for the west side would make management much more difficult. With all of the many salmon streams through out the west side it is of necessity a mixed stock fishery with a blended harvest approach. The west side management plan may not be perfect but it works. I hope that the board does not make changes that wreck the plan.

Sincerely Oliver Holm



Submitted by: Brooke Inman

Community of Residence: Kodiak, Alaska

Comment:

Dear Board of Fish Members,

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Brooke Inman

Proposal 62: Support

Proposal 64: Support

Proposal 66: Oppose

Proposal 70: Support

Proposal 71: Support

Proposal 72: Oppose

Proposal 73: Oppose

Proposal 74: Oppose



I am a life long commercial fisherman and 2nd generation Kodiak seiner. I grew up fishing with my dad and siblings and continue to fish with my sisters on my boat and alongside my brother on his own seiner which he purchased in 2023. My dad fished the central section on the west side of Kodiak throughout his career and I have continued to spend the majority of my seasons fishing these same areas.

I strongly oppose proposal 62

By implementing a 48hr advance opening for set netters and mandatory 48hr weekly closures for seiners the likelihood of fishing being a viable industry for me would be non existent. The Kodiak seine fishery has never been a short spurt fishery, the seasons are long and every fishing day matters. Small production days throughout the season add up and by curtailing the number of days that we can fish will make it difficult to make a season add up. In addition, closing the central section to seining would force the fleet to be concentrated in the remaining areas putting additional pressure on these runs, further limiting the fishing opportunities available to the seine fleet as whole. Closures to both gear types for conservation makes sense but for strictly allocative measures it is not justifiable.

I strongly oppose proposal 70

By allocating a non terminal harvest stock to a small portion of the salmon fleet the seiners will be largely put out of business. The central section is not a terminal harvest fishery and managing allocation goals would be impossible while managing for a sustained yield. Curtailing the seine fleet by allocating fish to the set netters would not guarantee these fish would be then swimming into the gill nets. The composition of the gill net fleet has changed dramatically since the 90's with gill net no longer fishing on the capes where many of the fish were historically caught by their gear type.

**I support proposal 60**

Allowing the department to implement 48hr extensions in the mainland district during the second two July openings in sections where the local pink and chum runs are strong. By giving the department the tools to extend this area when runs are strong the department will be better able to manage for sustained yeild. These extensions will help to spread out the seine fleet giving more opportunity to boats in every area

I support proposal 66

Kodiak is the last seine fishery in the state that requires lead web, by ending the requirement of incorporating lead web the seine nets will remain the same overall length and would not change any fishing methods. These changes would allow for a uniform net, no longer necessitating carrying multiple types of patch web and decrease the complexity of building nets

I support proposal 73

Adding Sturgeon River escapement considerations into the management of the Sturgeon section during even numbered years. Giving the department the tools to allow for fishing opportunity when stocks are strong and conserve when runs are weak. This would allow for a more fishing opportunity and spread out the seine fleet. While also giving management more tools to adequately manage Kodiak salmon runs.



Dear State of Alaska Board of Fisheries members,

My name is Sue Jeffrey and I am a Kodiak salmon setnet permit holder. My husband Dan Ogg also holds a Kodiak salmon setnet permit and together we have been fishing our setnet site in Uganik Bay since 1987. We have lived in Kodiak for more than half a century now and 2024 will mark our 38th salmon season in Uganik Bay.

I am writing today in support of Proposal numbers 62, 64, 70 and 71. Though different in methods, I am in favor of all four as they provide the means to help the Kodiak setnet fishery remain solvent and regain our historic share of the west side salmon harvest.

Throughout these nearly 40 years, we, like our fellow setnetters, have continually upgraded our fishing operations, investing in gear and equipment to increase our harvests and improve fish quality. However, it has become apparent over the years that improvements to our fishing operations in the west side setnet fleet are no match for the increasing efficiency and catching capacity of the Kodiak seine fleet.

This is played out in the Central Section on the west side of Kodiak Island because this is where the setnet fleet competes directly in time and area with the seine fleet. That is, nowhere else in the entire Kodiak Salmon Management Area are seiners and setnetters co-managed by regulation to fish at the same time within the same area. In other words, besides the Central District, which is open to both seine and setnet gear and the small setnet only district at the south end of Kodiak Island, the entire Kodiak Salmon Management Area is exclusive to seine gear only.

Therefore, I oppose Proposal numbers 66, 72, 73, 74. These proposals change Time, Area, or Gear regulations that increase the Kodiak seine fleet's efficiencies, harvest capacity and harvest opportunities, all at the expense of Kodiak's west side setnet fleet.

I very much appreciate your time and service on the Board of Fish and your consideration of this matter.

I also look forward to talking with you in Kodiak.

Sincerely,
Sue Jeffrey



Submitted by: Charlie Johnson

Community of Residence: Homer

Comment:

proposal 64 and 70 claim the setnetters harvested 50 percent of sockeye and 30 percent of pinks from 1990-2012 and for the last ten years only 34 percent sockeye and 19 percent of pinks for the west side . Driving down the west side of Kodiak in 1990 there were alot more set nets out there than there is are now . fewer nets in the water is going to equal less of a percentage of the total fish.

Proposal 60: Support	Proposal 61: Oppose	Proposal 62: Oppose	Proposal 63: Support
Proposal 64: Oppose	Proposal 65: Support	Proposal 66: Support	Proposal 67: Oppose
Proposal 68: Oppose	Proposal 69: Oppose	Proposal 70: Oppose	Proposal 71: Oppose
Proposal 72: Support	Proposal 73: Support	Proposal 74: Oppose	



Submitted by: Chris Johnson

Community of Residence: Kodiak, AK

Comment:

State of Alaska Board of Fisheries

RE: Opposition to Kodiak Finfish Proposal #'s 62, 65, 67, 68, 69, and 70; and Support of Proposal #'s 60, 66, 72, 73, and 74.

Chairman Wood and Board of Fisheries Members,

My name is Chris Johnson and I am a second-generation fisherman in Kodiak. I grew up fishing on my dad's boat and haven't missed a salmon season since I was 18. I bought into the industry in 2011 with a 25-foot jig boat and access to the jig fisheries focusing on cod and rockfish was the way that I could afford to move into the salmon fleet in 2013. I now rely primarily on salmon seining and live here year-round with my wife.

I believe that misleading data has been used to argue that seiners are cutting off fish from reaching setnetter's nets. They have included harvest from Inner and Outer Karluk, the Inner Bays, and Telrod Cove in their data, which are seine only areas that fish reach after passing through setnet areas. The setnets aren't catching them. Additionally, many of the fish harvested in Inner and Outer Karluk don't pass through the Central Section, and instead migrate to the Karluk system from the south.

All in all, I am supportive of finding ways to help my fellow fishing community members just so long as it does not mean taking time away from any one gear group to give to another. I am strongly in opposition to anything purely allocative. Any one of the proposals that attempt to create policy to take fish from one net to another would do untold damage to this fishery, this community, and most importantly, damage to the ecological system that we all rely on for our livelihoods.

I appreciate your time on this,

Chris Johnson, F/V North Star

Proposal 60: Support
Proposal 67: Oppose
Proposal 72: Support

Proposal 62: Oppose
Proposal 68: Oppose
Proposal 73: Support

Proposal 65: Oppose
Proposal 69: Oppose
Proposal 74: Support

Proposal 66: Support
Proposal 70: Oppose



PC67

Submitted by: Dimitian Kalugin

Community of Residence: Homer

Comment:

I am opposed to praposal 54. I am oppsed do to weather is usually better april time for small boats and fish schools up.

Iam for praposal 55.

Proposal 54: Oppose

Proposal 55: Support



PC68

Submitted by: Kiprian Kalugin

Community of Residence: Homer, Alaska

Comment:

NO on proposal 54

YES on proposal 55

Proposal 54: Oppose

Proposal 55: Support



PC69

Submitted by: Safron Kalugin

Community of Residence: Homer ak

Comment:

54no

55yes

Proposal 54: Oppose

Proposal 55: Support



Submitted by: Vladimir Kalugin

Community of Residence: Homer ak

Comment:

As a long time jig vessel I'm against proposal 54 and for proposal 55 because we only start catching cod around march 25th and it would be unfair for the pot boats to over take our quota.

Proposal 54: Oppose

Proposal 55: Support



Submitted by: Darius Kasprzak

Community of Residence: Kodiak, Alaska

Comment:

Madam Chair Marit Van-Dort and Board of Fish,

I am Darius Kasprzak, a Kodiak ported Jig fisherman owner- operator. My Jig vessels currently are F/V Marona (46') and F/V Lady Viking (34'). I am also experienced with a quarter century of Jig cod harvesting during continual Kodiak jig seasons.

I am Chair of, and representing the Alaska Jig Association (AJA).

AJA is strongly opposed to proposal 54. We consider this proposal to be a nearly perpetual, and de facto reallocation of Jig GHL to Pot GHL.

The inordinately high trigger percentage (25%) would put undue pressure on the predominantly small vessel Jig fleet (including open skiffs) to prematurely harvest Jig GHL, during the cold and stormy months of January through March. Our Kodiak fleet has demonstrated a stellar safety record throughout the years, and we would like to maintain this safety record. We believe it to be inadvisable to pressure the small vessel Jig fleet to take chances at this inclement time of year, in order to meet a catastrophically high trigger threshold for not relinquishing our Jig GHL to the Pot sector .

Consider that during the most recent Kodiak jig season (2023) the Jig fleet harvested its dedicated GHL by April 22, despite a harvest of only 20% GHL by March 25. In 2010, a season I remember well- our Jig fleet was reeling from historically low ex-vessel cod prices, following the Great Recession. After a GHL harvest of 13.4% by March 25, our sector went on to recover economically by fully harvesting a large GHL of over 6.5 million pounds.

Under the hypothetical scenario of proposal 54: our Jig fleet would have been dramatically preempted from catching our dedicated GHL, during these and other harvest years.

We would like to note that the status quo is working quite well; in the three full years that the current partial rollover provisions have been in effect, the Pot sector has had access to the Jig GHL during the single season (2022) of low Jig harvest. This is, despite the Pot sector not capitalizing on this opportunity to fully harvest the shared Jig GHL.

Conversely, the Jig sector has fully harvested its GHL (>90%) during the other two years of no rollover (2021 and 2023).

A lack of the rollover and the subsequent closing of Statewater Pot season does not mean an end of cod harvest ability for Pot vessels. In fact, Pot vessels can merely switch over to Jig gear and continue to harvest Jig GHL alongside the dedicated Jig vessels. Indeed, many Pot vessels have deployed this tactic of gear switching, to continue harvesting over the history of numerous Kodiak Statewater cod seasons.

AJA strongly supports proposal 55, which we have authored. In order to provide additional clarity to cod fishing stakeholders and the Department, we propose a realistic harvest trigger (10.2 %) which represents the ten year average of harvested Jig GHL by March 25.

To the best of our knowledge, a ten year average is consistent with the historical data utilized by the Department (under status quo).

Please note that we intend to modify Proposal 55 by submitting a Record Copy (RC) at the January 2024 BOF meeting in Kodiak. The RC will change the Proposal wording “the Commissioner may reopen a state-water season” to “the Commissioner shall reopen a state-water season”. This wording change will immediately rectify the Department’s concern over objective criteria (see Proposal 55 Staff Report) by removing any residual ambiguity regarding the rollover implementation criteria. This additional clarification will also benefit all stakeholders.

The Jig cod fishery is one of the only existing entry level fisheries, that is available to young and new participant stakeholders in the Kodiak Archipelago. It is very important to our town’s economy and diversity, that the Jig fishery not be expressly curtailed.

Welcome to Kodiak!

Darius Kasprzak

President, Alaska Jig Association

Proposal 54: Oppose

Proposal 55: Support



My name is Gary Knagin and I'm a Kodiak salmon seine permit holder. I've been fishing all my life mostly in the Kodiak area. I started getting compensated for salmon fishing in 1969 when I was 12 years old. Before that it was mostly just helping my parents with the family's setnet site on Uganik Island. Even at that young age I realized set netting on the westside was more of a lifestyle choice rather than a means to making serious money. My brothers and I talked my Dad into buying a seiner. He did and we started fishing the little 32' seiner in Terror Bay for a couple of years before moving further away from our set net site and eventually selling both the set net site and 32'er for a larger boat.

Cutting the seine fleets time reeks of an exclusive set net fishery that has never historically existed. Although I empathize with the set net holders the numbers looked at when one hears the percentage of fish historically caught by each user group do not truly represent what happens in a season. ie; the set nets are usually done and put away by the first week in September while there are some seiners that fish later in the season. Personally my latest delivery was October 7th and there are others who've been out longer.

The arguments that we are so much more efficient than we used to be are true, if you do anything long enough you eventually get better at it . In 1975 we were pulling our net in at a rate of 15 minutes sometimes a little faster, speedy retrieval of our gear isn't a new development. That being said adapting and overcoming are not things that should be penalized. It is why 160 boats are catching what historically 370 did in the past, less jobs will surely be available, therefore impacting the economy of the south central district as a whole. In my 40+ years fishing, I've seen the salmon industry move on an up and down cycle. It's on a down cycle and we'll all just have to figure out a way to deal with it, as we have in the past.

Proposals 62, 69 and 70 would be detrimental to the fleet. Set netters are asking for an allocation of fish that they can't possibly or are unwilling to harvest. With the smaller average sized pinks smaller mesh is required to catch more pinks which is less likely to entangle the larger species of sockeye salmon. With the largest section of the Kodiak area essentially closed to the seine fleet & fuel costs at the high level it is, travel to other areas in sometimes inclement weather conditions, safety is a concern. Further reducing the efficiency of the fleet would have a direct impact on the overall economy of our community, reaching far beyond the harbors.

I therefore urge the board to not implement these hardships. Again vote no on proposals 62,69 & 70.

Respectfully,
Gary Knagin



104 Center Avenue, Suite 205
Kodiak, AK 99615

Phone: 907-486-6555
Fax: 907-486-4105
www.kraa.org

To: John Wood, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

December 26, 2023

RE: Support for Board Action to Remove Proposal 59 from Consideration in Kodiak

TO: Chair Wood and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) would like to thank the Board for taking action to remove Proposal 59 from consideration at the upcoming Kodiak meeting of the Board of Fisheries. The discussion and action that took place during Miscellaneous Business on December 2, 2023 properly identified that Proposal 59, as published, referenced a statewide regulation and would impact all hatchery programs and thus should not have been placed on the agenda for Kodiak.

The inclusion of Proposal 59 as a statewide proposal for the Kodiak meeting generated consternation amongst the aquaculture associations and stakeholders alike as it would require a response from across coastal Alaska and drive stakeholders to attend a meeting outside of area, for most, and out of cycle. Furthermore, this prompted questions from a number of stakeholders to determine how such a proposal would have been included for Kodiak when it did not include reference to any Kodiak hatchery or local management plan. In discussion with ADF&G and Board Support staff, it was indicated that the original version of the proposal, as submitted, did reference Kodiak hatchery programs. KRAA made a request to view the original proposal and made the discovery that the original proposal did reference the given statewide statute but then included a Kodiak hatchery management plan that *does not exist* in regulation—or elsewhere. The fact that this hatchery management plan does not exist did clarify, to an extent, why Proposal 59 had likely been altered from its original language; when it was reviewed, the editors, likely recognized the references made were to a nonexistent management plan and were left only with a statewide regulation. At that point, one might expect that the proposal would (should) not have been published because it did not meet the call. Again, for this reason, KRAA supports the action the Board took to remove the proposal from consideration.



What is confounding in the process is that, since the Board took action to rightfully remove Proposal 59 from consideration, that proposal has been further edited and now exists in yet a different form from both the original and published versions. The current version still references the same statewide regulation but again makes reference to a non-existent Salmon Enhancement Allocation Plan and then goes further than either previous version to specify pink salmon.

In the most present iteration, the proposal has no more merit or validity than it did in either its original or published version, and leads me to speculate again on the process for determination and selection of proposals for publication. Again referencing the December 2, 2023 discussions under Miscellaneous Business, Board members questioned Board Support staff in relation to the cited regulation (5AAC 40.820), and it was recognized that the regulation in question is not one that falls under Board authority. The proposal's failure to offer valid reference to existing regulation or to propose regulatory language to meet the proposal request would also appear to fail any reasonable test for whether a proposal should be considered by the Board. KRAA opposes Proposal 59 in any form, and again supports the Board's action to remove it from consideration.

When I first engaged in the Board of Fisheries process, there was clear direction on the minimum standard for acceptance of a proposal for publication for an area. I understood I must identify the proper regulation and provide the correct form of editing or new language to achieve the aim of the proposal or it would not be accepted. If I needed assistance, it was clear that it would be available through inquiries to ADF&G staff; however, at the point of submitting a proposal to the Board of fish, it was clearly my responsibility to meet the necessary requirements.

Through the Boards of Fish and Game process, the State of Alaska honors the public with the ability to participate in the decision-making process for their fish and game resources and management. That honor brings with it an obligation for a member of the public to know and understand the resources and management of an area in which they submit a proposal, to have an awareness of the potential impacts of regulation they may propose, and to submit proposals that meet the requirements stipulated for consideration under the Board process and required to meet standards for publication and inclusion on the Board's agenda. The recent set of proposals targeting hatchery programs, like many of those of the previous 5-year period, fail to meet that standard, and yet we find ourselves at almost every Board of Fisheries meeting trying to battle misinformation and lack of understanding of the hatchery programs in the form of proposals such as Proposal 59.

Whether it was the proposer's intent or aim to include all hatchery programs or just those of Kodiak with Proposal 59, the constant, and often repetitive, series of hatchery proposals has us fighting the same battle at every meeting in nearly every area. Whether a proposal is directed at a single hatchery or all, it mobilizes and demands of hatchery operators and stakeholders across

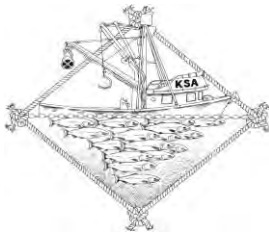


coastal Alaska alike that we engage and dedicate time and resources to protect the fisheries resources of the communities we all serve. For this reason, we would suggest there may be a way for the Board to structure future calls for proposals to the Board of Fisheries in a manner that raises the bar for hatchery proposals to be published in area and potentially centralizes hatchery-related proposals.

KRAA would like to again thank the Board for its action to remove Proposal 59 from consideration in Kodiak. We hope that, with regard to any future for this proposal, it is further recognized the proposal is improperly crafted to be accepted for publication in any form and it offers neither reference to an existing applicable regulation or management plan nor regulatory language for implementation that would allow for adoption by the Board. KRAA also encourages the Board to consider crafting future calls for proposals in a manner that limits the frequency and necessity to address broader hatchery matters in every area and every meeting.

Thank you for the opportunity to submit these comments.

Tina Fairbanks
Executive Director



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 26, 2023

To the Alaska Board of Fisheries,

The following comments apply to proposals 62 and 70, both of which intend to allocate fish to the setnet fleet by imposing setnet-only fishing periods and mandatory seine-closures in the Central Section of the Northwest Kodiak District. The Kodiak Seiners Association (KSA) is **strongly opposed** to these proposals. The data used in these comments is publicly available and was provided by the Alaska Department of Fish and Game and the Commercial Fisheries Entry Commission.

The Kodiak Seiners Association wholeheartedly disagrees both in theory and fact with the claims that underpin Proposals 62 and 70. The central hypothesis that setnet harvest declines are somehow driven by seine activity is demonstrably false, as shown later in this presentation. Other factors such as reduced participation in the setnet fishery, algal slime, a diminished early Karluk run, a strengthening late Karluk run, and small pink salmon are the primary sources of the declines in setnet productivity. All of these factors are discussed in detail below.

Just as much as we contend the factual basis determining the decline in setnet harvest rates, we also question the assertion that the average distribution of harvest that occurred from 1990 to 2012 is somehow objectively equitable. Despite the claim in the justification language that setnet harvest rates have “declined significantly since 1990,” the truth is that setnet harvest percentages *increased* continuously from 1990 to 2012, which begs the question of whether, based on the same justifications claimed in the proposal language, the Board should already have taken action during this period to curtail setnet harvests in order to restore the fishery to prior historical distributional norms. In fact, the distribution of harvest prior to 1990 is very similar to current rates, despite the fact that setnet effort has declined dramatically since that time.

Additionally, the period from 1990 to 2012 was also one of absolute economic carnage for the seine fleet. Collapsing salmon markets resulted in a precipitous loss of vessel participation during this period. The Kodiak seine fleet declined from 354 vessels in 1990, to a low of 128 in 2008, and although there has been somewhat of a recovery and stabilization of the fleet to an average of 160 participating vessels, participation rates have not exceeded 50% of available permits since 2000. No other major salmon fishery in the state has endured such a prolonged level of suppressed participation, and this has occurred despite the fact that Kodiak seine permits remain the lowest valued of any seine fishery, regularly trading below \$40,000. We ask the Board to consider how one could justifiably declare that the standard for the “equitable” distribution of harvest between gear



types is one that occurred during peak productivity of the setnet fleet and the simultaneous string of bankruptcies experienced by the seine fleet?

The Board should also understand that the Central Section is the largest and most fished section in the KMA with the most fishing opportunity and highest overall productivity. This area is the breadbasket of Kodiak, and since 1985 an average of 75% of participating vessels have fished this area. Needless to say, loss of harvest opportunity for the seine fleet in the Central Section would be devastating, and would only continue the deterioration of this fleet that began in 1990. These proposals were developed without any input from or consideration for the local seine fleet, and especially for the vessels hailing from the 3 remote communities that are located within the Northwest Kodiak District.

Finally, the Board should consider the general futility of attempting to allocate fish to a non-terminal, mixed stock, multi-species setnet fishery. No such allocative plan exists in the state, and for good reason – setnet fishermen cannot reliably harvest salmon in non-terminal areas, and individual fishermen cannot even simultaneously harvest multiple species with equal effectiveness, as differing body size complicates any effort to select a web mesh size that will optimize harvest of all species at once. The Central Section is a mixed stock harvest area and is home to substantial pink, chum, sockeye and coho runs with overlapping run timing. And while west side setnet fishermen are, and remain, highly effective at harvesting sockeye, their ability to harvest other species is highly unreliable, and many fishermen simply choose to target just sockeye for the entirety of the season, despite the presence of multiple stocks.

The following is a point-by-point analysis of how changes in west side run dynamics, ecology, and participation rates have impacted the harvests volumes and gear-type distribution, as well as some of the flaws in the central claims that support these proposals.

Bad Data

Much of the data that has been used to demonstrate the seine fleet's impact on the setnet fleet has been applied inappropriately and does not support their central thesis that seiners operating in the Central Section are depriving setnetters of traditional harvest volumes. In the justification language for proposals 62 and 70, the proposers aggregated harvest data from the inner bays, Telrod Cove special harvest area, inner Karluk and outer Karluk sections, even though each of these sections are seine-only areas that fish can only reach after migrating past or through setnets in the Central Section, or in the case of Karluk may not have even migrated into the Central Section when heading to their natal stream. These sections are essentially overflow areas where seiners only get to harvest surplus fish that the setnet fleet failed to catch – in other words, we get their leftovers in these sections. If seiners operating in the Central Section were somehow preventing the setnetters from harvesting fish, then naturally these areas would also be deprived of salmon. Including harvest from these areas in their argument that seiners are cutting them off is entirely illogical.

The inclusion of harvest from the inner and outer Karluk sections is particularly misleading, since many of these fish don't even migrate through the Central Section, and a substantial portion of the sockeye caught here in recent years were harvested in the late-season when most if not all of the setnets have been removed from the water. In fact, the late-season fishery at Karluk is relatively new; 2012 was the first season in many years with continuous fishing time and effort in this area.



The growth of this fishery is the result of an increasingly strong late sockeye run coupled with reduced escapement goals that has generated more fishing opportunity in the inner and outer Karluk sections in September. The Karluk River produces the latest sockeye run in the state, with peak productivity typically in September. To get an idea of how much this fishery has grown, the 146,720 sockeye that seiners harvested in inner Karluk in 2023 is more than the combined total harvest during the 25-year period from 1987-2012. All of this harvest occurred after virtually every setnet had been removed from the water.

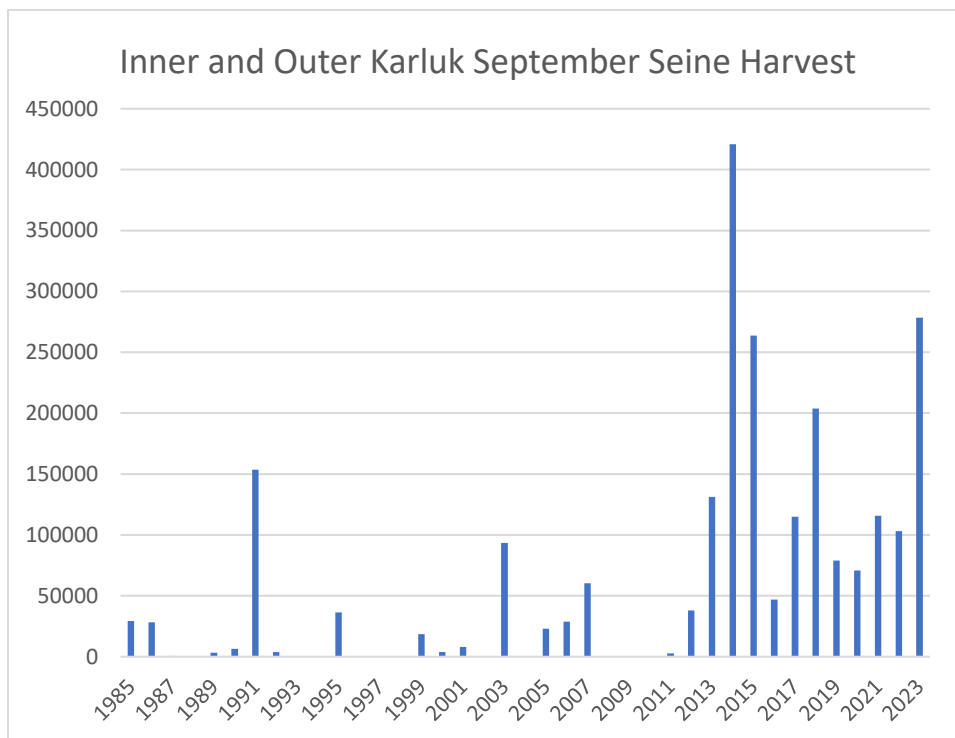


Figure 1: The late-run Karluk fishery suddenly materialized in 2012.

Despite assertions in the proposal justification language, Late Karluk sockeye historically do not tend to migrate through the Central Section to nearly the extent typical of early-run fish, therefore many of these fish wouldn't be caught by the setnet fleet even if they exhibited significant effort this period. During the past 10 years, seiners have harvested an average of 170,000 sockeye in the inner and outer Karluk sections in September while setnetters have produced little to no effort. Over half of the setnet fleet didn't even fish past September 5 in all of these years, and they averaged just 1.3 deliveries per permit during this period. In fact, in 2022 and 2023 there was virtually no setnet effort in September. The inclusion of harvest data from inner and outer Karluk, and even the Central Section, during a period of time when setnetters are barely even fishing creates a highly misleading characterization on how seine effort has impacted setnet effort over the past 10 years. Proposals 62 and 70, if adopted, would close off the Central Section to seining for some if not all of September even if no setnets are left in the water, as was the case in 2022 and 2023.

Harvest data from the inner bays and Telrod Cove also does not support the central hypothesis that seine fishing activity is depriving the setnet fishermen of harvest opportunities. Fish harvested in these areas must first pass through the Central Section, and are only harvested once



they have migrated past every setnet site. In fact, it is the effectiveness of the setnet fishermen that impact this area, and not vice versa. Spikes in harvest in these areas in years like 2017 and 2019 simply demonstrate that substantial volumes of fish were available for setnet harvest, yet they failed to catch them. More will be discussed on this topic shortly.

Additionally, the justification language in proposals 62 and 70 imply that the setnet fleet is in a state of economic freefall. Publicly available data on fishery earnings from the CFEC clearly suggest otherwise. Over the past 20 years setnet earnings in Kodiak has been slowly, yet steadily increasing. While the rate of increase has not matched the seine fleet, neither has the growth in operating costs for setnet fishermen matched that of the Seiners who have endured skyrocketing fuel, insurance, and maintenance costs on a fleet of vessels predominantly built over 30 years ago. The Board should keep in mind that the seiners endured a long period of economic hardship that resulted in the loss of over half of the participating fleet, which naturally contributes to an increase in average earnings. While the setnet fleet has also declined in participation, they still have yet to undergo a period of economic hardship comparable to the one experienced by the seiners.

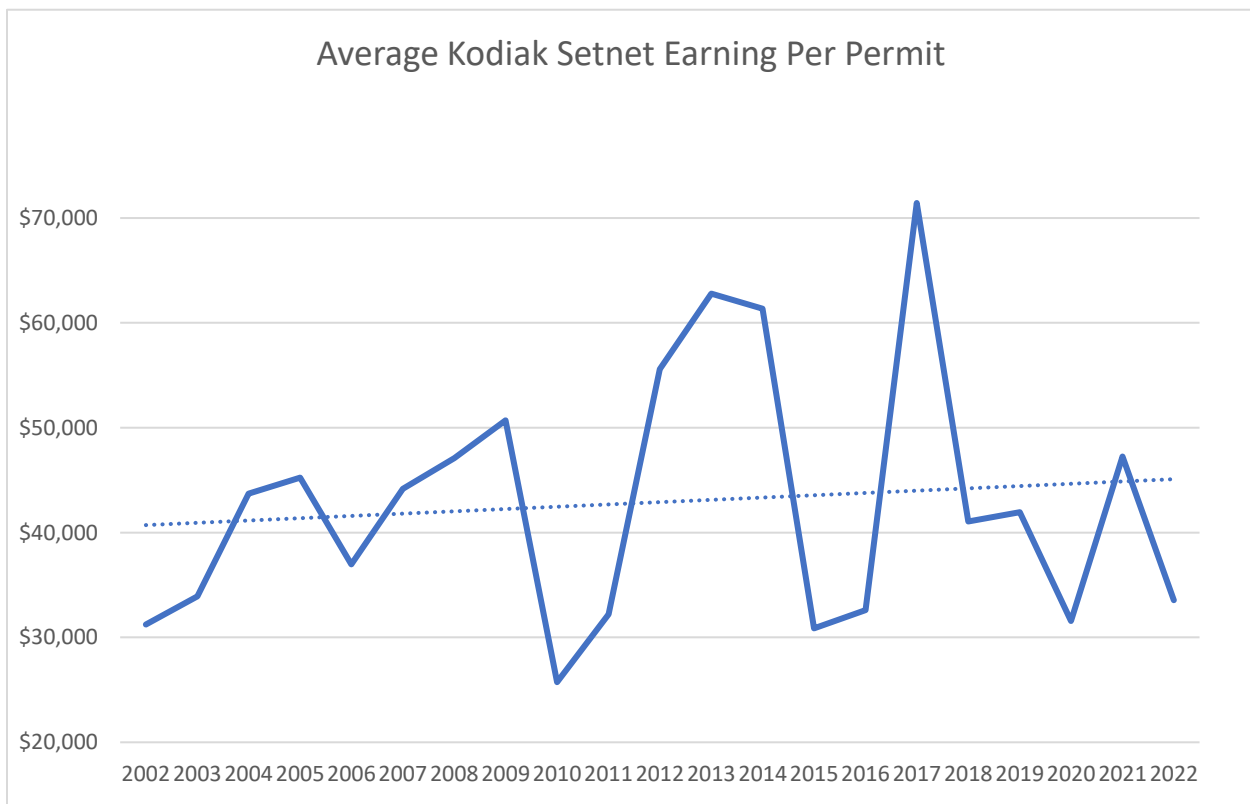


Figure 2: Kodiak setnet permit average earnings have been gradually increasing for 20 years. It should be noted that this data is for all setnet permits, including Alitak, since the CFEC doesn't resolve data by regulatory section, however, west side setnet fishermen account for the majority of setnet permits fished in Kodiak.



Decline in Sockeye

The harvest of sockeye in Kodiak has declined substantially since the peak harvest era of 1990-2007. On average, Kodiak fishermen have harvested 36% fewer sockeye annually since that time for all gear types. The Central Section has generally followed this trend and has experienced a 40% decline in sockeye harvested by both gear types over this same period. Proposals 62 and 70 attempt to identify the seine fleet as the primary source of their recent harvest declines, yet these proposals fail to recognize that *both* gear types have experienced dramatic reductions in sockeye harvests as a result of overall lower productivity in comparison to the 1990's and early 2000's. A setnet fleet that has capitalized around higher historical productivity will naturally contract during periods when runs decline.

One thing to note is that despite reduced effort by west side setnet fishermen, their share of the overall Kodiak area harvest remains within their range of historical productivity both as an aggregate harvest for their gear type and as a percentage of total harvest per permit. Their productivity in recent years is below their *peak* era of the early 2000's, however, their higher production at this time relative the rest of the island's fishermen clearly resulted from a combination of optimal run dynamics and historically low seine participation. It is particularly important to note the sudden drop in productivity that occurred in 2008 and that has been sustained ever since. This isn't due to a sudden influx of highly efficient and effective seiners that year – in fact 2008 is the year with the historically lowest seiner participation at 128 vessels, instead, the reduction from peak productivity was the result of suddenly occurring and since sustained change in run dynamics on the island, as will be explained later. Nevertheless, overall reduction in sockeye productivity for Kodiak naturally lead to declining participation rates by setnetters, which in turn has resulted to their reduced relative productivity.

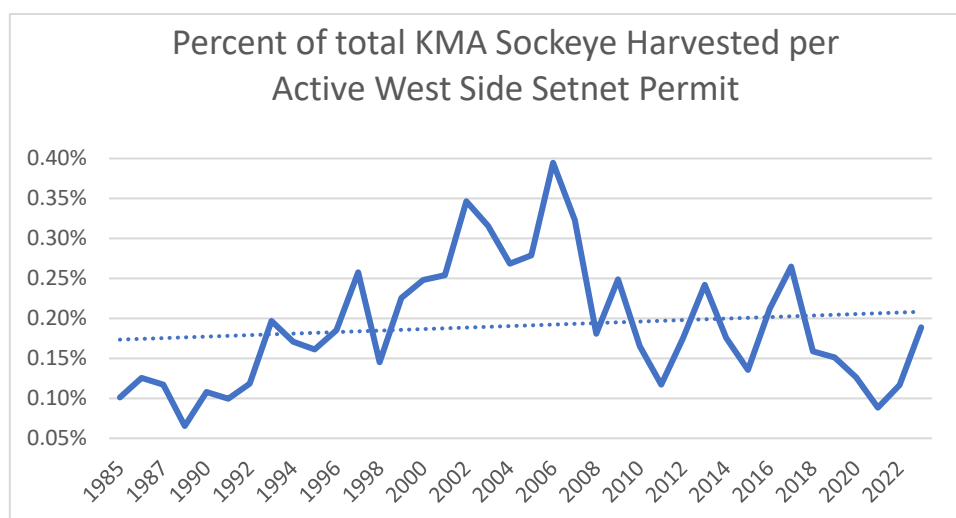


Figure 3: West Side setnet fishermen have kept up with the Jones', so to speak. Their portion of the total KMA sockeye harvest per permit fished remains in the historical norm for the management area.



Reduced Setnet Participation

Diminishing effort within the setnet fleet has been the greatest driving factor reducing West Side setnet harvest rates. Not only are there steadily fewer setnet permits being fished, but current active permit holders are opting to fish fewer days – a result that shouldn't be surprising given the

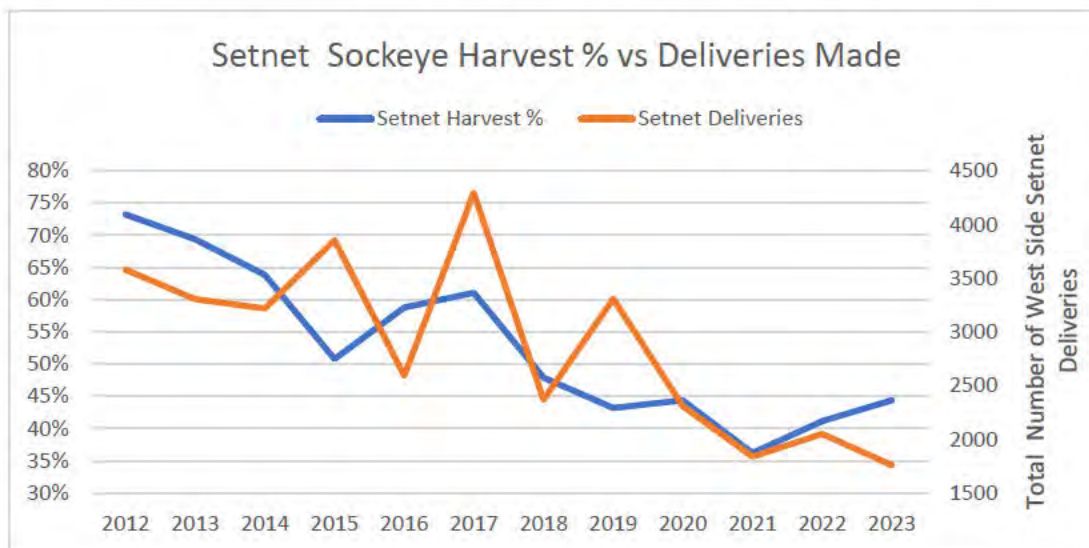
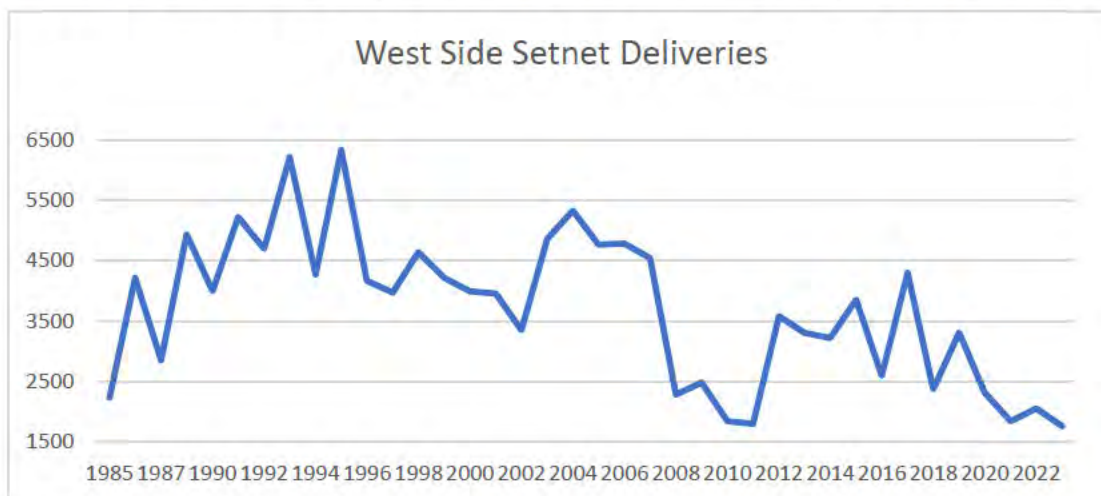


Figure 4: The percentage of sockeye harvested on the west side has closely tracked the number of deliveries made by setnet fishermen. Generally speaking, the more days they choose to fish, the higher portion of the fish they catch.

overall reduced volumes of sockeye present on both the West Side, and the Island as a whole. Reduction in setnet harvest rates track very closely to annual effort: When fewer setnetters are fishing, their harvest rates decline as is apparent in figure 4. The graph below shows the long-term trend in delivery patterns. Setnetters are proposing that the time period from 1990-2012 represents what they feel should be used as the standard for their expectation of harvest rates, however they



averaged 47% more deliveries during this period than over the past 10 years. Again, overall



reduction in fish volumes along with deteriorating market conditions has led to a substantial reduction in setnet effort which in turn has caused the decline in their total gear type harvest rates.

Despite the decline in aggregate setnet sockeye harvest rates, the actual effectiveness of the setnet fishery has increased over this same time when analyzing the portion of the catch per setnet delivery. That is to say, although total harvest declined over time for both gear types, setnetters are actually catching a higher portion of the sockeye when they actually fish. The chart below plots the change over time in this trend. However, reduced effort from the gear group has resulted in lower

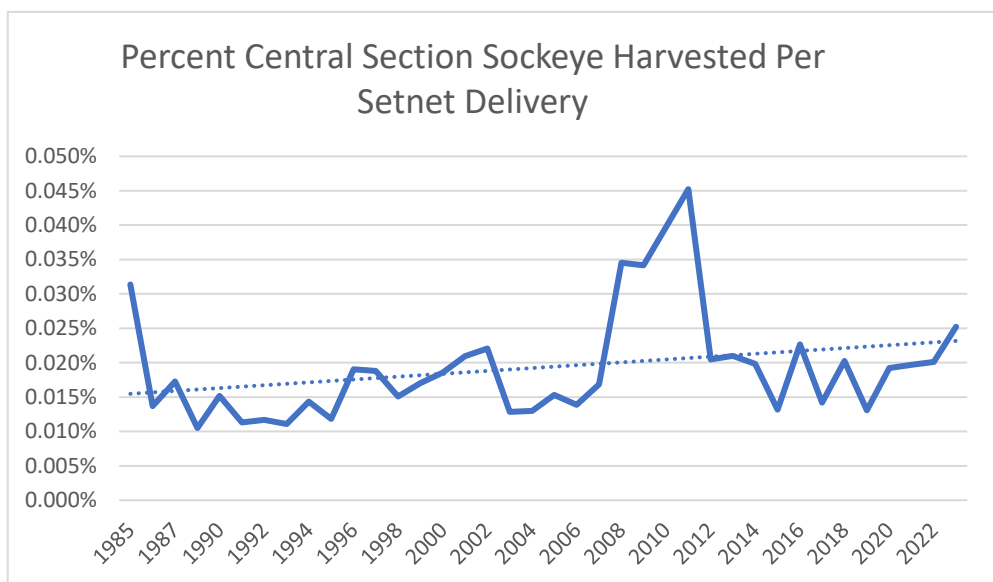


Figure 5: The average West Side setnet sockeye delivery as a portion of the total combined sockeye harvest for the year has been increasing over time.

aggregate harvest rates as fewer setnet sites are operating, and many sites are choosing to fish a shorter season, despite the fact that fishing opportunity has generally remained stable over time.

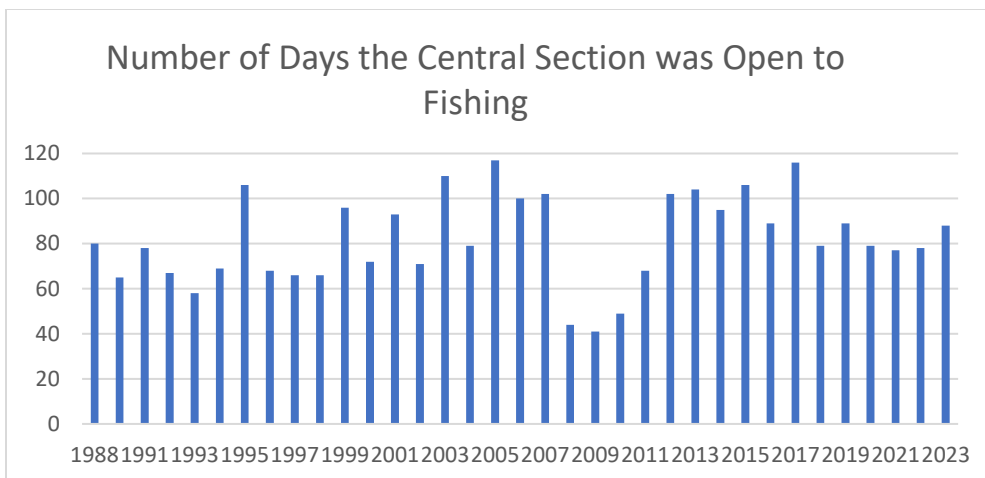


Figure 6: The number of days the central section has opened has increased on average in recent years.

In addition to reduced overall participation rates, setnetters have also geographically contracted their efforts. The roughly 25 mile stretch of coast line from Broken Point in Uganik Bay to Chief Cove used to be home to some of the most productive setnet operations on the island, yet now there is little to no regular setnet effort for this entire stretch of coastline, as sea lion predation and increasingly rough weather conditions have made operating in this area untenable for setnet fishermen. These setnet sites were historically intermixed with seine sets, so that by retreating from this area, much of the fish that would have been caught by those sites are now harvested by seine fishermen working in that area, creating a compounding effect to reduce setnet harvest rates. The red line on the map below shows the stretch of coastline that once produced prolific setnet harvests and that they choose to no longer fish regularly.

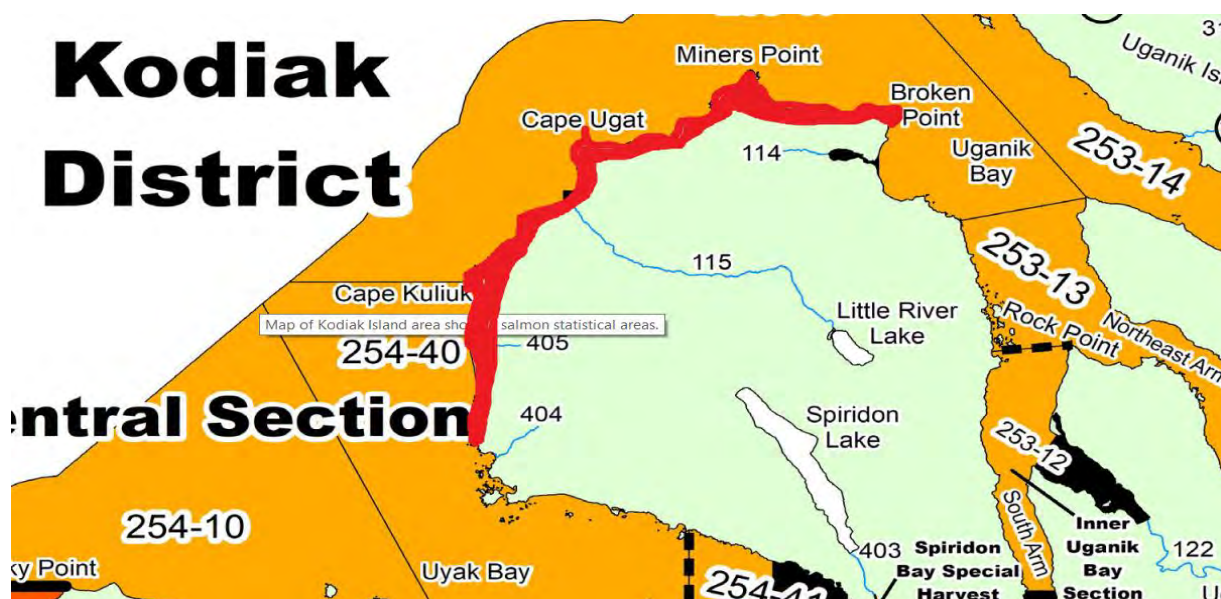


Figure 7: Area no longer regularly fished by setnet fishermen.



It makes no sense to expect the relative productivity of the setnet fleet compared to the seine fleet to remain at the historically high levels of the early 2000's when there are fewer setnets being fished, their fishermen are choosing to fish fewer days, and they are fishing a smaller geographic area, all while virtually abandoning effort along the most productive stretch of coast line in the Northwest District.

Algal Slime

Another major driving factor in the reduction of setnet harvest rates is the increased occurrence of algal slime. In order to address this problem setnetters submitted **proposal 67** for the 2020 BOF Kodiak finfish meeting requesting the use of monofilament web. The theory was that algal slime would not bind as readily to monofilament fibers as it does with multifilament web. Although the seiners were concerned with the potential ecological impacts of employing a web type that would likely increase the dropout rate in a fishery that already has an excessively high dropout rate, we supported their attempt to mitigate the algae problem through this proposal and the Board ultimately passed proposal 67. In their justification language for the proposal, the Northwest Setnetters Association declared

Kodiak salmon setnet fishermen are experiencing increasing extreme slime events. 2017 and 2018 were the worst that have occurred. During these time periods – approximately 26 days in 2017 and 21 days in 2018 - setnets were coated with slime and rendered unfishable. The slime occurred during some of the most productive time periods, late July and early August, for Kodiak setnetters. The slime we are experiencing is so heavy it is difficult to leave our web in the water. It becomes so heavy that it breaks the net from the setnet frame.

There were numerous public comments submitted by setnetters that included testimonials on how drastically the fishery is being impacted by the slime. One person wrote

I have seen how slime events can drastically shut down our fishery. I like a clean net and have both a volume pump and pressure washer that I use all the time, but when the slime hits no matter how often I wash the net, the fishing just dies

Another person wrote

...over recent years, we have been plagued by a thick gooey slime you can wash your net clean, and by the time you're done, it's slimed again. It totally stops your fishing.

There are numerous other public comments that decry the increasingly negative impact that algal slime has placed on the fishery. Even at the 2023 Kodiak Advisory Council meeting, one setnetter declared that algal slime essentially shuts her operation down for “weeks”.

Knowing that setnet gear, by the admission of setnetters themselves, is now frequently rendered entirely ineffective for weeks at a time during the most productive period of the season, it is difficult to understand how the Board or the Department could effectively allocate fish to a gear type that has publicly stated that they cannot catch them.



Given that the time frame during which the algal events occur coincides with the peak of the local pink and chum runs, it is no wonder why their share of the harvest would decline, even without their substantially reduced participation rates. If seine-only closures were implemented on the west side, then the likely result would be drastically reduced total harvests out of the section, since if the seiners aren't allowed to catch the fish, and the setnetters aren't able to catch the fish, then substantial volumes of surplus salmon would simply go unharvested. Not only would this violate the sustained yield principle, a constitutional requirement that underpins the sustainable and beneficent management of Alaska's fisheries, but this would contribute to an overall depressed local economy for the community of Kodiak, where we rely on the ability of our fishing fleets to maintain the opportunity to sustainably access our local fishery resources.

Reduced West Side Run Volumes

While many setnetters are fixated on shifting distribution of harvest between gear types, the primary factor driving declining harvest is weakening overall run strength of both sockeye and pink salmon. 1990 to 2007 is the historical peak for both sockeye harvested in the entire KMA as well as the Central Section. Since that time the Central Section has experienced a 40% reduction of total sockeye harvested by both gear types and a 29% decline in pink salmon harvests. There are some notable changes in particular that have a significant impact on setnet harvests, which are described below:

1. Karluk Early-run Decline

The early Karluk sockeye run came roaring back to life in 1992 after over 50 years of poor productivity. This run became the cornerstone of the setnet fishery, and in particular, the early run was especially productive for this fleet – from 1990 to 2007, setnetters harvested 42% of their total sockeye before July 5, averaging 305,000 fish annually. In 2008, the early Karluk fishery dropped suddenly in productivity, and has failed to produce consistently ever since. Setnet fishermen are now averaging an aggregate harvest of just 90,000 sockeye before July 6.

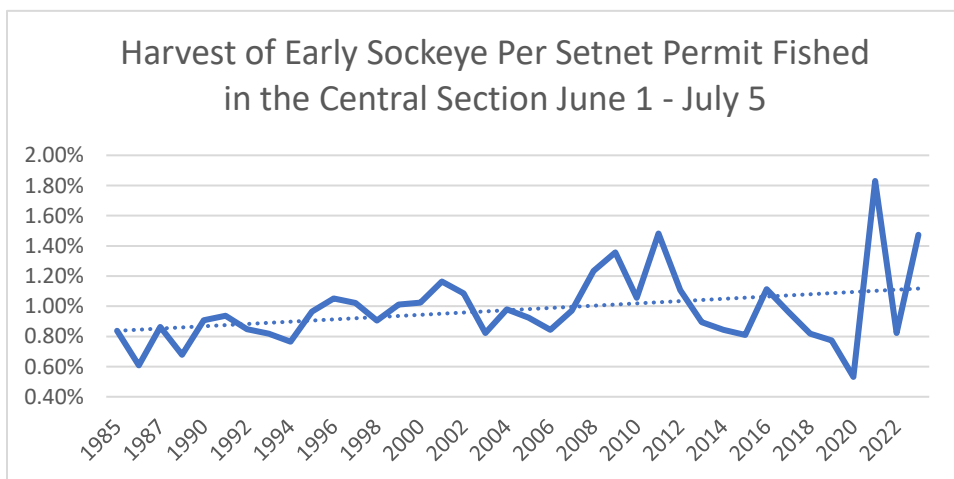


Figure 8: Individual setnet fishermen have captured a growing share of the early Karluk sockeye catch



During this early fishing period, sockeye harvested by both gear types in the Central Section has declined by 67%, and it has been over 5 years since total red salmon harvested in the Central Section exceeded 100,000 fish before July 6. Nevertheless, west side setnetters still typically catch the majority of the early-season sockeye in the Central Section. In fact, with a record low of 44 permits fishing, setnet fishermen still accounted for 65% of the early Central Section sockeye harvest in 2023, and the long term trend of total harvest per setnet permit has generally increased over time, as shown in the graph.

West Side setnetters have experienced an average reduction of 3,545 reds harvested per active permit during the period of 2008-2023 compared to 1990-2007. Most of that decline, roughly 60%, is attributable to the period from June 1 – July 5, during which they are catching on average 2,083 fewer sockeye per permit, despite remaining the dominant user group for this time period. This means that the decline of the early Karluk sockeye run, though still effectively harvested by the setnet fleet, accounts for the majority of the decline of their sockeye catch. This is not an allocative problem that has deteriorated their fishery – it's a conservation problem, and the only solution is to continue to adhere to a management plan that focuses on managing the fishery to achieve

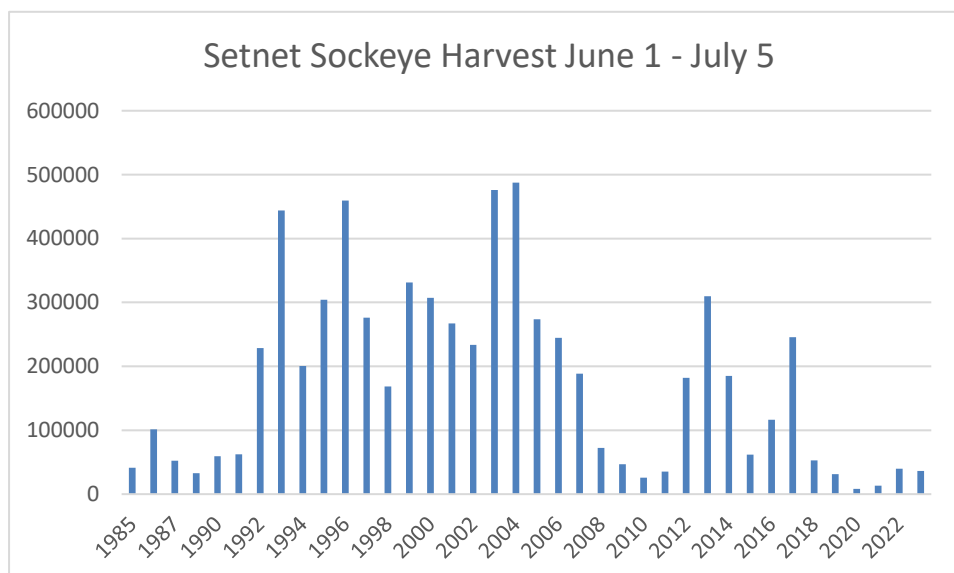


Figure 9: The decline the early-run Karluk sockeye fishery accounts for most of the decline in setnet sockeye harvest volumes in recent years.

escapement goals.

Without a significant early Karluk sockeye run, the distribution of sockeye harvested between gear types in the Central Section has returned to the historical levels that were typical before 1992. While late-run Karluk sockeye remain very strong, these fish do not tend to migrate through the bays of the Central Section to the same extent as the early-run. This migration pattern is very similar to the Chignik bimodal sockeye run – the early component approaches the lagoon predominantly from the north, while the late run favors a southward path.



Unfortunately, there are ecological headwinds that may inhibit a return to previous early Karluk sockeye run levels. The unusually dry summers of 2015 and 2019 resulted in the elimination of substantial portions of the early Karluk sockeye runs for those years, as these fish tend to spawn in the small upper tributaries of the Karluk river system. These higher elevation streams largely became dry during the arid summers, killing off spawning salmon and destroying fertilized eggs in the river beds. If Kodiak continues to experience such prolonged droughts, then the early Karluk sockeye run will remain at the relatively low levels we have seen in recent years, and setnet sockeye harvests will continue at levels that were typical prior to 1990. In this event, it would benefit the setnet fleet to refocus their effort on pink salmon. The fleet is currently capitalized and configured around a sockeye fishery that has largely failed to materialize consistently for the past 15 years.

2. Even-year Pink Salmon Fishery Collapse

After the record harvest of 15,150,000 pink salmon in the Central Section in 2006, the subsequent generation of fish failed to materialize. Despite the strong parent year, in 2008 the total harvest for both gear types plummeted to just 2 million pinks. With the exception of a decent harvest in 2012, even-year Northwest District pink runs still remain depressed. Preservation of even-year pink runs to the Northwest District should be of particular importance to the setnet fleet since these fish have substantially larger body sizes than odd-year fish, making them more amenable to harvest in setnet gear that is also targeting sockeye. On average, the share of pinks caught by setnetters on even years is over 20% higher than on odd years, likely due to larger fish body size.

The Gulf of Alaska is currently stuck in boom-and-bust cycles in odd and even years, resulting in substantially smaller fish size during the higher productivity odd-years. Since the many west side setnetters target sockeye and only incidentally harvest those pinks that are large enough to be captured in sockeye web, increasingly small odd-year fish are often unharvestable by many setnetters. At this year's Kodiak AC meeting, one setnetter declared that he doesn't even worry about pink salmon, since many of them just swim through his web. Even years, however, produce larger pink salmon and impact on setnet harvests is clear. Take 2016 for example, when the entire Gulf of Alaska pink salmon run collapsed, resulting in humpies that were similarly sized to sockeye – setnetters were able to harvest a near record 49% of Central Section pinks while only remaining on par with recent years' sockeye harvest percentages.

For this reason, it should be of paramount importance to setnetters to rebuild our even-year pink returns to the Northwest District. Unfortunately, setnet fishermen have largely advocated for managing the west side to provide maximum fishing time over optimal conservation and largely resist any conservation efforts that require them to stop fishing. At the 2020 Kodiak Board of Fisheries finfish meeting, the Board even approved a proposal from setnetters that allowed the Department to open the Central Section based on pink salmon escapement to the Karluk river, which is in the Southwest Kodiak District. There is no data or tagging studies suggesting that Karluk pink salmon migrate throughout the Central Section. Nevertheless, the approval of this proposal resulted in near continuous fishing in Central Section in 2022, despite relatively poor returns to the Northwest Kodiak District that required all of the inner bay sections to remain closed to conserve those fish. This management approach, as advocated for by the setnet fleet will delay the recovery of pink and chum stocks in the Northwest Kodiak District. The Board should also note that by closing



all of the seine-only inner bay areas while keeping the Central Section open conveys the entirety of the conservation burden of local stocks on the seine fleet.

Ultimately, if the setnet fleet wants to improve their pink salmon harvests the best approach would be to make a short-term conservation sacrifice supporting more conservative pink management of the Central Section in order to improve escapement, especially on even-numbered years when they are able to harvest the fish more effectively. In the absence of previous years' sockeye run volumes, this approach coupled with a refocus of their efforts on pink salmon would give their fleet the best opportunity to succeed in the fishery.

Additionally, the setnet focus shouldn't be on the percentage of pink salmon that they catch relative to the seiners – it should be on the *volume* that they harvest. Setnet pink salmon harvest volumes are inversely proportional to the percentage they harvest, when their percentage is high their catch numbers are typically low. Ultimately, the processors don't pay by the percent, they pay by the pound, and in order to improve poundage we need better conservation of pink salmon in the Northwest District.

Odd years – Lots of Little Fish

Overall pink harvests in the Central Section have declined by 29% for both gear types since 2008. As described above, even-year pink runs in the Northwest District have not recovered from the collapse that began in 2008 (Little River, is a notable exception. It has produced large pink runs on even-numbered years, however there are no longer any setnets regularly operating within 10 miles of this system). Over the past 15 years the Northwest District switched from even to odd year run dominance, and 2015, 2017, and 2019 produced above-average pink salmon harvests in the Northwest District. While setnet harvest volumes rose during these years, the increasingly smaller

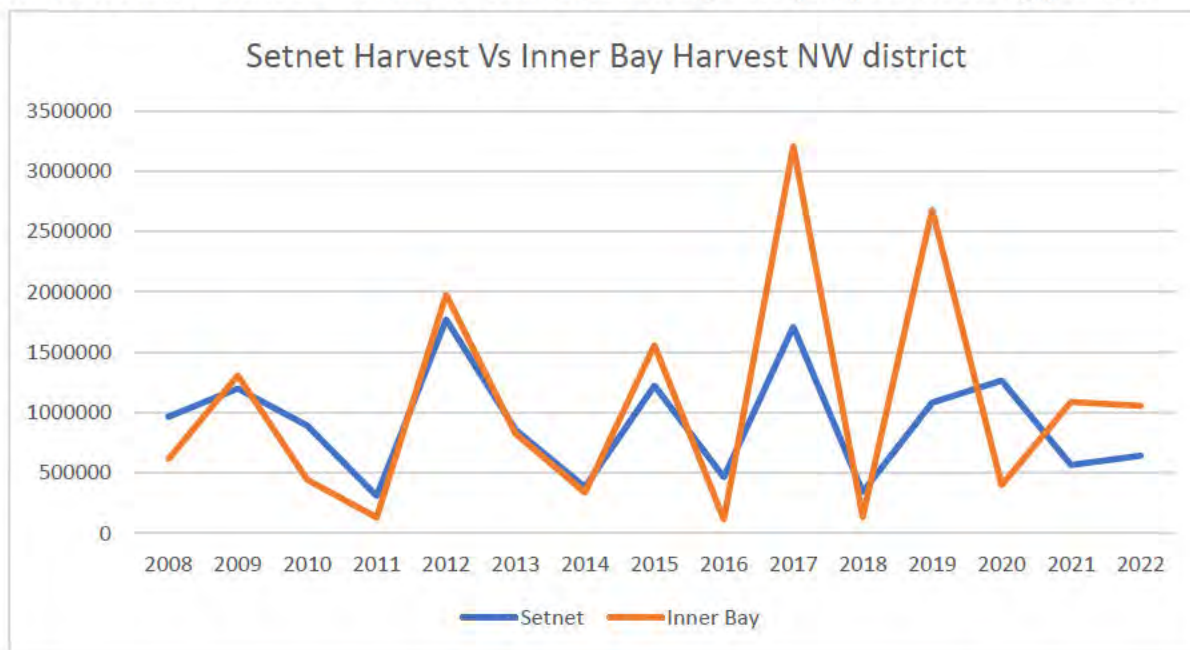


Figure 10: Inner bay and setnet harvests began to diverge in 2015, as algal slime and small fish plagued West Side setnet fishermen.



body size of these fish confounded setnetters who already operated under the inherent strain of a multispecies gillnet fishery.

The impact of small fish and algal slime is apparent when examining west side setnet harvests compared to harvests in inner bay sections of the Northwest District, as shown in *figure 10*. Fish have to pass through the Central Section and past all of the gillnets before making it into the inner bays. Typically, harvests in the inner bays correlated directly with setnet harvests prior to 2014, however on odd years, this pattern changed noticeably in 2015, 2017 and 2019 when inner bay harvests spiked dramatically while setnet harvests failed to materialize to nearly the same extent. Millions of fish simply migrated past and through the setnets without any significant increase in their harvests. Whether this is due to algal slime, small fish, low effort or a combination of these factors, it is clear that they were unable to harvest the fish that were available to them.

This is why efforts to allocate pink salmon to west side setnetters will be largely ineffective – they are already often unable to harvest the surplus fish available in the Central Section. Under these conditions, seine-only closures on the west side would largely serve to suppress the harvest of the seine fleet by many multiples more than it would improve the harvest of the setnet fleet. This not a terminal harvest, single species fishery, like in Bristol Bay or the hatcheries of Prince William sound; it is impossible to effectively allocate fish to the setnet fleet without substantially lowering overall yield from the fishery, resulting in numerous hardships for Kodiak's fishing families and communities.

Chum Salmon

Setnet chum harvest provide an ideal control group to understand how body size, run dynamics and algal slime have impacted the setnet fleet. West side chum runs peak much earlier than pink salmon runs and setnetters catch roughly 80% of their chum harvest before August 5, so algal slime impacts are far less pronounced for harvest of this species. Additionally, though chum body size may be somewhat smaller on average, they are still larger than reds, and so they will not be able to swim through gillnet web the way smaller pinks can. Finally, chum run dynamics have not changed as noticeably as have the west side pink and sockeye runs. Chum harvests have declined by about 19% during the last 15 years in comparison to the period from 1990-2007, a significantly smaller figure than the declines of pink and sockeye and indicative a relatively more stable fishery.

With these factors out of play chum harvests have remained remarkably stable for west side setnet fishermen. There is no noticeable decline for their gear type, as is evident in the charts below:

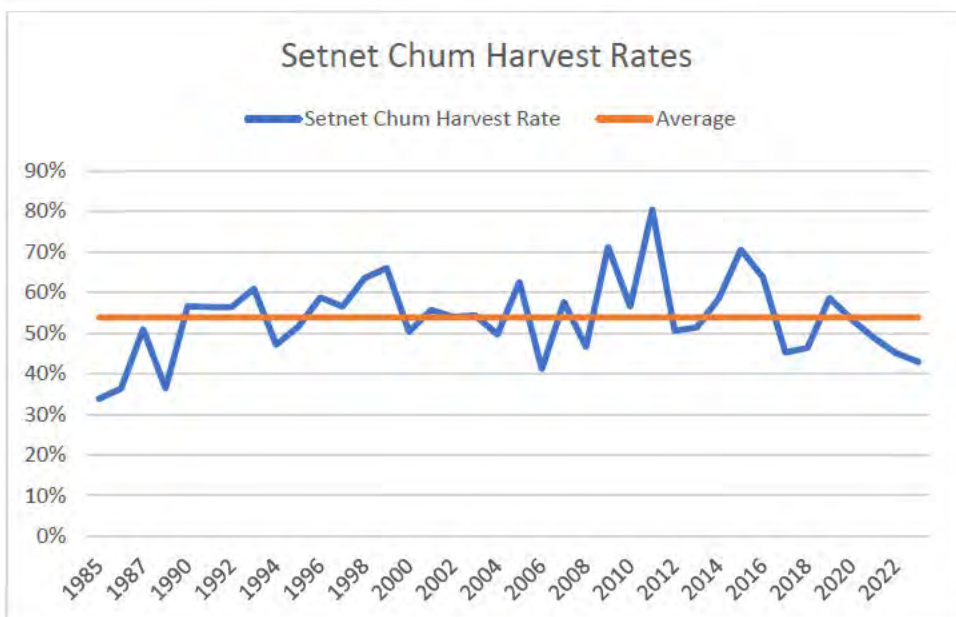


Figure 11: West Side Chum runs peak before the occurrence of algal slime and occur during the portion of the season that most setnet fishermen are choosing to fish.

It would entirely defy logic to conclude that seine fleet is somehow driving the decline of setnet sockeye and pink harvests, yet somehow, have not found a way to improve their chum harvests. The overly simplistic analysis provided in proposals 62 and 70 that purports that *because* seine harvest rates of pink and sockeye have increased they therefore *must* be the root cause driving the decrease in setnet harvests does not hold up to a rigorous analysis of this fishery. There is no way for that theory to somehow account for such steady setnet chum harvest rates, without

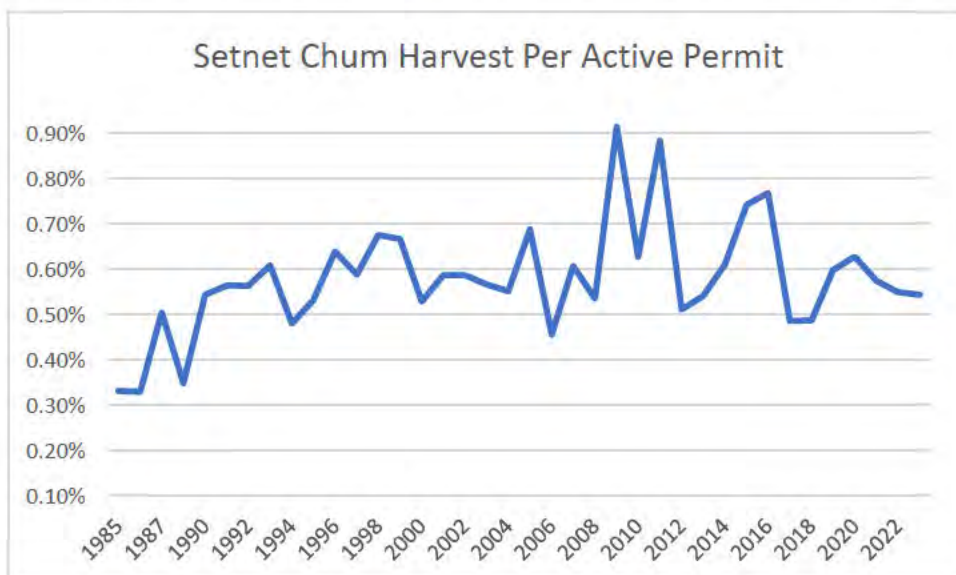


Figure 12: The portion of the chum harvest per active setnet permit has remained stable, since declines in body size and algal slime have less of an impact on the harvest of these fish.



completely defying basic logic. Instead, a multitude of factors have contributed to a changing west side fishery, and the allocative changes proposed in these proposals in no way addresses the underlying causes of their slow decline. Again, reduced participation, algal slime, small fish, even year pink collapse and a depleted early Karluk sockeye fishery are clearly culprits plaguing West Side setnetters.

What About Alitak?

The prevailing narrative proposed by setnetters that recent improvements in seiner efficiency combined with changes in seine harvest patterns has driven the decline of the setnet fleet is entirely unfounded. Seiners have fished the same sets with the same regulation nets, and largely the same vessels for decades, and most improvements to vessel operations simply work to make up for some of the lost harvest capacity generated by the absence of 200 additional vessels that once fished our area.

Nevertheless, Kodiak has another mixed gear type area, the Alitak District, that can be used as a control group to test the hypothesis posed by west side setnetters that changes to our fleet is somehow causing their declining harvests. ALL sockeye harvested by Alitak setnetters in this District must first pass by the seine fleet. If the fishing effectiveness of the seine fleet had improved to the degree supposed by the west side setnetters, then the Alitak setnet fishermen would see a decline in their harvest share. This has not happened. The graph below shows the annual harvests of seiners and setnetters in the Alitak District.

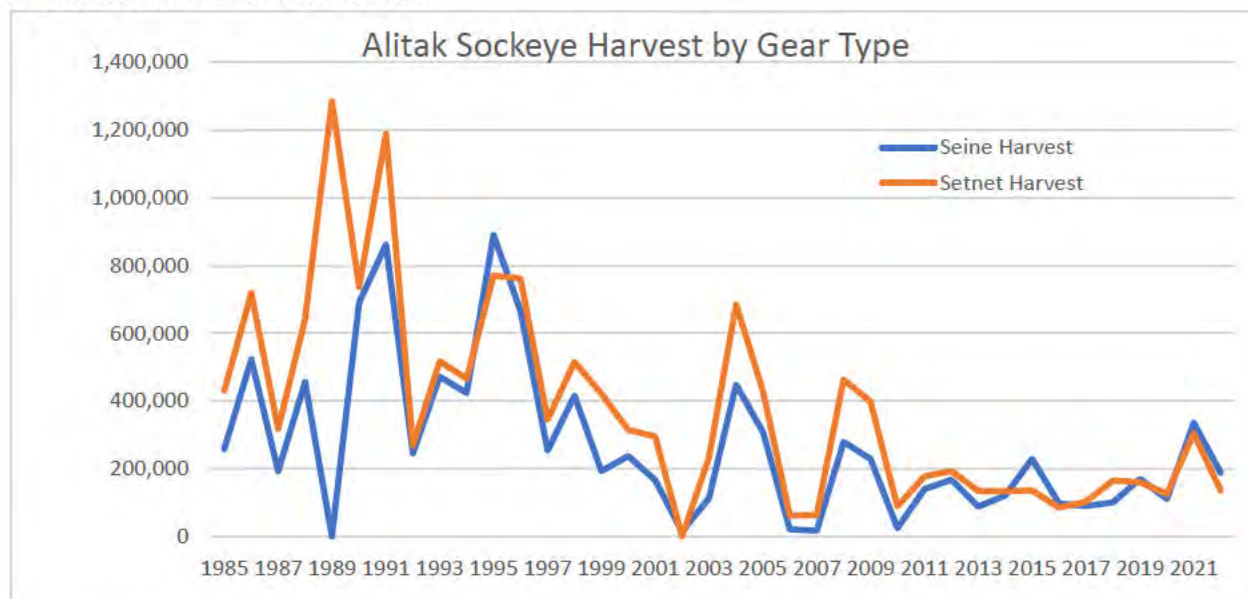


Figure 13: The distribution of sockeye harvests between seiners and setnetters in Alitak remains stable.

It is clear from the graph that there has not been a dramatic shift in harvest share between the two gear types. It should be noted that there has been a slight increase in seine harvest percentages,



however, lower overall harvest volumes has led to a substantial decrease in setnet effort, which, like in the Northwest District, impacts setnet total harvest volumes.

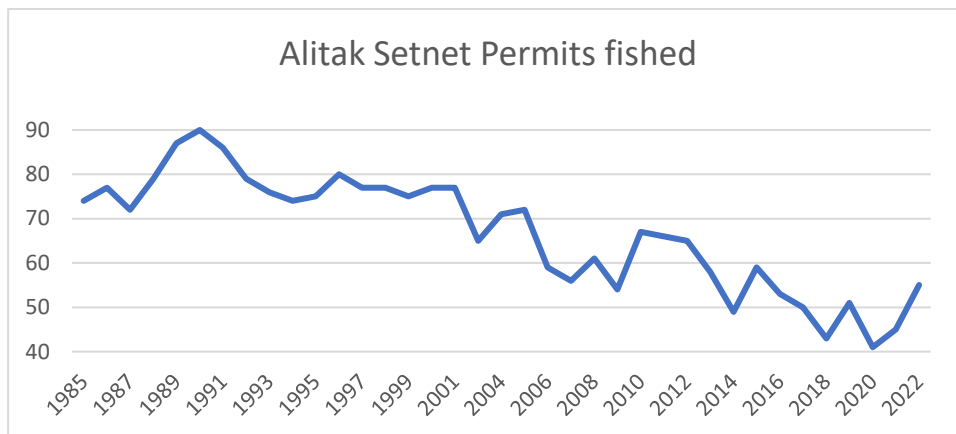


Figure 14: The number of active setnet permits operated in Alitak has declined dramatically in recent years.

When analyzing harvest per active setnet permit, there has actually been a steady *increase* in the proportion of sockeye harvested for individual setnet fishermen in Alitak:

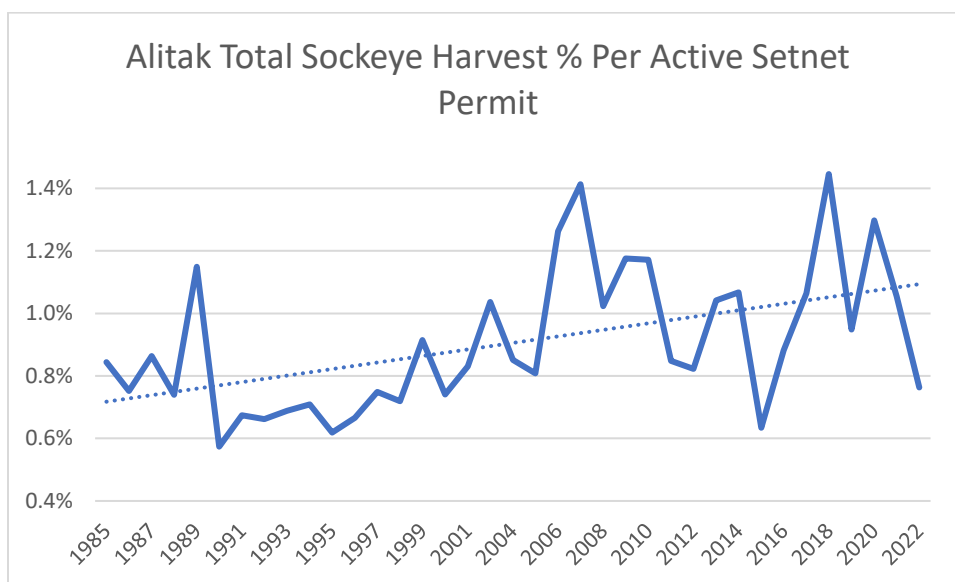


Figure 15: While the number of active setnet permits in Alitak has declined, the portion of the sockeye harvested per permit, including seine harvest, has increased.

This information alone should compel the Board and setnet fishermen to look beyond the seine fleet when analyzing the root causes of aggregate setnet harvests declines on the west side. It is an untenable argument to somehow claim that the seine fishermen in the Central Section have improved their harvest effectiveness in the Central Section meanwhile the Alitak seine fleet, which is



comprised of many of the same vessels that operate on the west side, has somehow failed to improve their vessel efficiency when operating in Alitak.

And Also Everywhere Else

If one were to believe that that recent improvement in seiner efficiency has resulted in a dramatic increase in harvest effectiveness to the degree that fishermen operating on the capes are essentially able to starve the bays of harvest, then this begs the question as to why pink and chum salmon harvests in the bays elsewhere on the Island have somehow not been impacted. Districts like the East Side, Alitak, Izhut Bay and Outer Kitoi have all seen sustained harvests deep in the bays, despite seiner activity on the capes that theoretically should be preventing fish from entering those bays. It again defies logic to claim that *only* Central Section seiners have improved their harvest capacity while every other District in Kodiak is operating with a somehow ineffective fleet.

Wasted Surplus

As explained above, west side setnetters with their reduced effort, focus on sockeye, and impacts of algal slime are simply not able to harvest the surplus salmon that they are asking to be allocated in the Central Section. Many of these fish, such as Karluk pink and reds do not necessarily even migrate through much of the Central Section, while the local pink and chum of the Northwest District are not even targeted by many setnetters who prefer to employ gillnet web sizes that better target sockeye.

Under proposals 62 and 70 many of the fish that seiners would be prevented from catching would go unharvested. While more fish would certainly pass to the inner bays, where seiners may be able to catch some of them, these are small management areas and are inadequate to provide for the full harvest of surplus stocks. Additionally, all of the inner bays have substantial pink *and* chum runs, and for the latter half of the season these areas typically only open when the Department believes there is a harvestable surplus of *both* species. For example, if the chum run to Zachar bay is weak, but the pink run is strong, local managers will close the Zachar Bay section when opening the Central Section, allowing for harvest opportunity on the more abundant pinks within the Central Section while providing an additional conservation corridor in the Zachar Bay section to protect the weaker chum stocks. In this way, the Department has been able to adeptly manage the Northwest District for sustainable yield of multiple stocks and multiple species by opening and closing inner bays sections while keeping the Central Section open.

The Inner and Outer Karluk sections of the Southwest Kodiak District are similarly managed for multiple stocks, but unlike the inner bays of the Northwest District, the inner and outer Karluk sections are in the Shelikof Strait and are often rendered completely unfishable for most vessels due to increasingly rough weather conditions. Depriving the Department of the ability to allow seine activity in the Central Section to harvest Karluk stocks would result in the same conflict in management goals for multiple species of overlapping run timing, but with the additional complicating factor of weather conditions preventing most, and often all, vessels from operating safely in these sections when the Department determines that there is a harvestable surplus. The



result would be choosing between the untenable choice of over escaping the Karluk sockeye system or allowing excessive pressure on potentially weak pink, coho or chinook stocks, both entirely undesirable and unacceptable outcomes. Also, the Board should consider the allocative implications within the seine fleet of forcing fishermen to focus their harvest efforts exclusively in sections that do not provide adequate protection for the numerous smaller vessels that operate almost exclusively in the more protected areas within the Central Section. Many of these smaller vessels belong to up-and-coming fishermen who are getting their start in the fishery and would be adversely impacted.

Finally, the Central Section itself contains numerous salmon streams that are far outside of the inner bay areas. Little River, Campbells Lagoon, and the streams of Viekoda Bay are among the salmon systems that can produce significant volumes of fish that the setnet fleet would be unlikely to catch. These systems can aggregate to hundreds of thousands of fish that would likely go unharvested under proposals 62 and 70. Little River, in particular, which is one of the largest salmon systems on the west side, is located near Cape Ugat in the Shelikof Strait, roughly 10 miles from the nearest regularly operated setnet site. When algal slime, small bodied pinks or other conditions combine to reduce the harvest efficacy of setnet fishermen, then these runs would simply be wasted, further contributing to already reduced yields that would result from the allocative proposals of 62 and 70.

Ultimately, proposals 62 and 70 hamstring that Department's ability to manage the Northwest District and the Karluk fishery for sustained yield, especially when considering co-management of multiple species simultaneously. This reason alone should be sufficient for the Board to reject these proposals, as the sustainable salmon policy must underpin any management plan within the state.

Unintended Allocative Impacts

Every change to a management plan will result in unintended consequences, and proposals 62 and 70 are no different. Kodiak is a large management area, and most boats specialize in fishing small portions of the KMA. The Central Section is the largest management section with the most fishing opportunity and largest overall harvest volumes. Many boats focus their effort in some portion of the Central Section. In particular, the resident fleets of the remote villages of Port Lions and Larsen Bay, along with the last two seiners from Ouzinkie spend much of their time fishing this section. None of these communities were consulted when proposals 62 and 70 were crafted despite the fact that their implementation would most acutely affect the vessels operating out of these ports. These communities are located *in* the Central Section and passage of these proposals would largely disenfranchise their fishermen of traditional fishing opportunities in their home regions.

The Alaska Board of Fisheries has historically failed to acknowledge that Kodiak is home to 6 remote Alutiiq villages that are highly dependent on access to local fishery resources. 5 of these communities, Port Lions, Larsen Bay, Akhiok, Old Harbor, and Ouzinkie, engage actively in Kodiak's salmon seine fishery. Kodiak's total fleet has been more than halved since the decline in salmon markets in the 90's, while the fleets of these villages have experienced an even higher decline in participation. Before passing any proposals that would reduce fishing opportunity in the Northwest Kodiak District, the Board should be sure to consult the residents and tribal leaders of the three



villages located in this area to assure that the changes would not further deteriorate their resident fleets.

Additionally, the Northwest District is home to the most protected fishing grounds which provide the most consistently safe fishing opportunities for Kodiak's small vessel fleet. Unlike Area M, Southeast, and Prince William Sound, Kodiak is still predominantly a small-boat fishery with many vessels under 50' most of which were built in the 70's and 80's. Closing the Central Section to seining would disproportionately impact these smaller vessels that often cannot safely travel to other areas or operate in the southwest Kodiak District, which is entirely exposed to the Shelikof Strait. Recent trends of increasingly inclement weather have displaced many vessels from the traditional cape fisheries and into the bays. Proposals 62 and 70 would have the unintended consequence of diluting the harvest opportunities of small vessels in the inner bays, when they are even open, or forcing these vessels to make the decision to either stop fishing during seine-only closures or risk traveling through and fishing in rough weather conditions. The inevitable result would be an allocative shift within the seine fishery to larger vessels that can handle fishing in rough weather or travel safely to other fishing grounds.

The Problem with Staggered Openings

In addition to seine-only closures, the implementation of staggered openings during in-season management is problematic from a management standpoint. This would mean that when the Department observes a surplus of harvestable stocks in the Northwest District, then, when accounting for the 24-hour mandatory advance notice for any opening in the KMA, there would be a minimum of 72 hours before the seine fleet would be able to access those stocks in the Central Section. Many of these fish would just migrate through the Central Section to their natal streams and go unharvested. No fishery in the state can be properly managed for escapement when imposing a mandatory 72-hour lag time to fishery openings for the primary gear type, especially in a mixed stock, non-terminal fishery. This aspect of proposal 62 will result in excessive waste of fish, especially after July 13th, when in-season management transitions from scheduled openers to purely escapement-based management.

Advance openings could be possible in June and early July, but the Board should be aware that limitations on harvest in the Central Section increase the possibility that inner and outer Karluk will be opened to control escapement, which in turn returns the Department to the dilemma of managing overlapping stocks at Karluk, as the recently declining Chinook runs overlap in June with the early Karluk run. Once again, the Department could be left with the decision of either over-escaping Karluk, or placing excessive pressure on weak Chinook stocks.

In Conclusion

Proposals 62 and 70 fail to address the primary causes of declining harvests for west side fishermen. In terms of the *percentage* of fish harvested by setnet fishermen, improvements would best be made through changes to their own fishing operations. Setnetters need to fish more days and a larger area if they wish to increase their harvest percentages. The effort put forth by setnet fishermen is entirely within their control and before asking to curtail the fishing activity of another

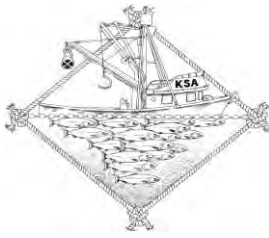


user group perhaps they should simply exploit more of the harvest opportunities that are available to them. Otherwise, how could the Board of Fisheries effectively allocate harvest to a gear type based on a harvest rate that resulted from an effort level that they no longer put forth? It is clear that when they actually fish, and when algal slime is not present, that setnet fishermen are just as effective as they had been in the past, and are in fact harvesting a *higher* share of the fish when their gear is actually in the water, however, with fewer of them fishing, and most of them choosing not to fish for much of the season, it is no wonder why their aggregate share of the catch has declined.

However, if instead of fixating on the *percentage* of fish that they harvest, west side setnet fishermen were to focus on the volume of fish, which is what really matters, then the focus should be on better conservation of Northwest District stocks, and the continued conservation of early Karluk stocks. And while west side setnetters may claim that seine only closures would improve conservation, the truth is that the seine fleet always has and always will focus their efforts on abundant stocks and move away from weak stocks. As a result, when, say, Terror and Uganik Bay pink stocks are weak, and the inner bays in these areas are closed, the only remaining fishermen operating anywhere near these systems are setnet fishermen, who fish the same sites no matter the strength of nearby runs. As a result, even though setnet fishermen typically only harvest 15-50% pink stocks, they are the primary source of harvest pressure on weak stocks, and so any attempts to conserve Northwest stocks must involve Central Section closures to *both* gear types in order to be effective. Additionally, without a return of the early Karluk run through continued escapement-based management and conservation, west side setnet fishermen will not be able to return to their harvest volumes of 1990 to 2007.

Ultimately, proposals 62 and 70 would seriously inhibit the ability of the Department to manage for sustained yield for multiple overlapping species migrating to the Northwest District and the Karluk River system. This reason alone should be sufficient for the Board to reject these proposals on constitutional grounds, as the Department has made it abundantly clear they cannot effectively manage this area while encumbered by purely allocative restrictions that prevent the harvest and conservation of multiple overlapping stocks.

These proposals would necessarily result in reduced overall harvests in the KMA, and a resultant economic loss to our fishermen and communities. The negative economic impacts would propagate through the town, harming not only local fishermen, but processors and shoreside businesses that rely in the steady flow of income to Kodiak's fishing fleet. Kodiak is not a region that can afford to squander the fishery resources that our communities rely so heavily upon, and so **we ask the Board to please reject proposals 62 and 70, in order to provide our regional fishing communities with the greatest opportunity for cultural well-being and economic prosperity.**



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 26, 2023

To the Alaska Board of Fisheries,

The Kodiak Seiners Association (KSA) **opposes proposal 67**. Minimum escapement goals should be set by the department based on scientifically determined sustainable yield considerations, not based on the arbitrary and unrealistic standards of single individual. While we understand that the salmon systems running through the population centers of Mat-Su valleys have very high in-river use, the same is not true for the remote streams of Kodiak. The commercial fishing fleet is by far the primary user group for the Ayakulik river by every measure available – number of users, economic productivity, historical dependance, etc. The current escapement goals provide more than ample recreational fishing opportunity for the few individuals who are able to travel to this remote area to fish. In addition to the tens of thousands, if not hundreds of thousands of sockeye that are available *per user* at any given time in the fall, there are typically many thousands of coho also available per angler. This isn't an area with combat fishing for limited fish like on the Kenai, this is the Ayakulik.

Additionally, this unrealistic minimum threshold is set long before the peak of the generally unpredictably timed coho run, and would likely never be met. Although the inner Ayakulik section virtually never opens in the fall, there is the possibility that excessive pink or sockeye numbers would provide for a short opening to this area and the department should have the ability to manage for these stocks.

After August 25th, the Ayakulik system is managed exclusively for Coho and inner Ayakulik never opens during this period anyways, since operation of the weir is generally untenable late in the season due to high water, pink carcass wash-out, and, more than anything, insufficient department funding to maintain a weir for coho. As a result, the only opportunity for seiners harvest coho is in the *outer* Ayakulik section, which is already managed conservatively allowing for at most one 77-hour weekly opening.

KSA would also like to correct for the record some of the misconceptions conveyed in the justification language for this proposal. First of all, there are no set gillnets operating in the Southwest Kodiak district, they operate only in the Northwest Kodiak District and the Alitak District. Also, seiners do not fish "wide open" at the Ayakulik in the fall. As mentioned previously, this area is already conservatively managed for sustainable coho escapement, and in recent memory to the river mouth during the coho season. And finally, the Ayakulik is *not* a vital system for subsistence use. It is



a remote salmon system with no year-round population and only a handful of guides operate here for the few wealthy clients who can afford to travel to this remote area.



Kodiak Seiners Association
PO Box 8835
Kodiak, AK 99615

December 26, 2023

To the Alaska Board of Fisheries,

The Kodiak Seiners Association **opposes Proposal 68**. The Karluk system *does* have a management plan for coho on the Karluk River, and this system has historically been managed conservatively for these fish. Coho management on the Karluk begins on September 5th, which is well before the peak of this run. Seiners don't generally fish "wide open" here after mid-September as claimed in the proposal, and in fact in 2022, in order to conserve coho, inner Karluk *never* opened after September 5th, and even outer Karluk was restricted to just 54-hour weekly openings to harvest sockeye. In 2023, conservation of coho also resulted in limited weekly openings in the inner Karluk section of just 54 hours.

Karluk needs to be managed for both coho and sockeye in the fall. These arbitrarily imposed minimum escapement thresholds would rarely be met. Lack of Department funding and, on even years, pink salmon carcass washout now prevents the weir from being operated very long into September, so the likely outcome of this proposal would be to close the Inner Karluk area to seining for the entirety of the fall which would result in the chronic over-escapement and subsequent collapse of the Karluk sockeye fishery.

The Karluk drainage houses some of the most optimal and pristine sockeye spawning habitat in the state, which is why such a small drainage and lake system is capable of producing an incredibly high density of fish that all rear in the Karluk Lake. This makes this system particularly susceptible to the pitfalls of over escapement, as smolt population booms can lead to over-grazing of plankton in the Karluk Lake, essentially starving all rearing fish. The last time the Karluk River collapses it took over 50 years to restore the run to its productive potential. This proposal is short-sighted and promotes an overly simplistic and generally false depiction of how fishery resources are managed in Kodiak.

Also, despite the proposers claims, setnets are not operated in the Southwest Kodiak District, which includes the inner and outer Karluk sections.



Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Re: Support for proposals 60, 66, 72, and 73

Dear Chairman Wood and Board of Fisheries members,

Proposal 60

The Kodiak Seiners Association asks the Board for consideration of Proposal 60 which would allow up to 48-hour extensions in areas on the mainland exhibiting strong returns of local pink and chum salmon.

In 2020 the Board of Fish took action to curtail fishing efforts in the mainland section of the Kodiak management area, with the sole focus on the limitation of harvest of sockeye in these areas, yet as a result, the department has its hands tied in managing for maximum sustained yield in the mainland areas where large runs of pinks and chums go largely unharvested during the mid to late July time frame. The mainland section of Kodiak prior to 1989 supported canneries and up to 50 vessels a summer on the pink salmon and chum salmon runs alone. These runs have been in a state of rebuilding ever since 1989 due to the decimation of those runs by the Exxon Oil spill, and in recent years have exhibited larger abundances of early pinks and chums.

In addition, the Kodiak fleet is comprised of a significant number of vessels that were built in the 1980's and weather patterns in recent years has made crossing the Shelikof Strait a gamble for those boats wishing to branch out and get away from the nucleus of the salmon fishery; the Central section. Allowing the department flexibility to manage for local mainland stocks and extend openers based on abundance of pinks and chums would allow greater opportunity for our fleet to cross the Shelikof, without fear of getting stranded by weather and wasting excess fuel.

Proposal 66

KSA requests Board support for the proposal to remove the requirement for 7-inch lead web and allow for a seine to be 250 fathoms in length.

Kodiak is currently the only area in the state with the 7-inch lead web requirement, a relic from a time period when seine fishermen fished detachable leads and the concern was that the detached portion could be used to fish illegally in creeks or other closed waters. Every vessel that currently fishes Kodiak uses a sewn-in lead and therefore the requirement for 7-inch mesh no longer applies to an existing regulation concern. Allowing the seine fleet to utilize traditional 3.5-inch seine web in place of the current required web would serve 2 distinct purposes:

1. Cost:

As every salmon net in the state uses 3.5" seine "body" web, lightly used body web could be recycled into the lead section of a seine saving the user thousands of dollars



in replacement of lead web. Given the current economic climate of the fishing industry, any savings on gear would be highly valued.

2. Safety:

Depending on the direction fish are travelling, up to 50% of the traditional seine sets around the island necessitate fishing with the seine boat close to the beach. For deeper draft heavy boats, this increases the risk of touching bottom while towing on the net. Many operators will “switch around” and fish with the skiff close to the beach to keep the main vessel farther away from the shore, however for some, the ability to “switch seine direction” isn’t a reality.

Proposal 72

KSA asks the board support this proposal as it is a small change that should have been made back in 2020 when the Westside Management Plan in the Kodiak area was changed to allow the Central section to be managed for pink salmon returning to Karluk as well as pink salmon returning to systems within the Central section. For context The Southwest Afognak section of the Kodiak management area has always opened with the Central section for pink and this proposal would maintain that consistency.

Proposal 73

Proposal 73 seeks to allow some flexibility for the department to manage the Sturgeon River section of the Southwest Kodiak District based on pink salmon returning to the Sturgeon River during even years when pink salmon returns have shown to be strong. Currently, this section is managed on even years for pink and late run sockeye salmon returning to the Karluk River.

In the last two even years, 2020 and 2022, the Sturgeon River has experienced an increase in run strength of pink salmon. Currently under regulation this section must be managed for late run sockeye returning to Karluk and pink salmon returning to Karluk, with no ability for management to open or close this section based on pinks returning to the Sturgeon River.

For the time period of July 16th-August 24th in 2020, pink salmon harvest in the Sturgeon section was approximately, 1,031,770 pinks with a total estimated escapement of over 1.5 million pinks, and in 2022 pink salmon harvest was approximately 834,862 pinks with escapement estimated at 800,000.

It is our intent that allowing harvest opportunity in the Sturgeon river section in even years when an abundance of pink salmon exists for both the Karluk and Sturgeon rivers would give the seine fleet opportunity to spread out and fish in a non-gear conflict area that has historically been opened when only Karluk pink salmon returns are strong.

We recognize the department’s concern with this proposal and providing protection for late run sockeye returning to Karluk, and are open to any language changes that would alleviate the department’s concerns regarding sockeye.



Submitted by: Saron Kojin

Community of Residence: Homer AK

Comment:

See attached

Proposal 54: Oppose

Proposal 55: Support



Submitted by: David Kubaik

Community of Residence: Kodiak, Alaska

Comment:

I will address only proposals I feel particularly passionate about. They are as follows.

Proposal #57. Support. It is about time the herring harvest regarding the wasted sac roe fishery and the potential food herring market were addressed. It is all the same resource and dividing it into sac roe or food/bait is a false dichotomy. #57 does a good job of balancing out these issues and potentially opening up market possibilities.

Proposal #62. Oppose. The changing climate has caused disruptive patterns in the migration of salmon. Warmer waters have caused thick algae blooms. Changes in the production of various salmon streams no longer monitored by ADFG with pre-emergent surveys have shifted salmon concentrations. Set salmon gillnet crews are no longer easily hired due to diminished catches and ex-vessel values. The fact that set salmon gillnets are no longer a very effective or efficient way to harvest salmon in traditional sites around Kodiak Island will not be saved, salvaged, or relieved by more time wishing for fish to hit, algae to disperse, or prices to rise. More time to soak ineffective gear will simply mean salmon will pass by and not be harvested in an orderly manner.

Proposal #63. Oppose. In many ways this proposal is an attempt to likewise relieve the issues Proposal #62 tries to fix. It is not going to cure the changes that shifting environmental regimes are causing to a fixed entity in a changing world. "The gear isn't working, so we need more." Fewer and fewer operators with more and more gear is not a prescription for efficiency or production.

Proposal #65. Oppose. If one were to fly from Kodiak to Akhiok via Larsen Bay and, paying attention to the world below them, mention what they had seen on the way, they would be violating the law under this proposal. "I saw boats working off Green Banks," could start your court experience. This proposal is as unnecessary as it is unenforceable.

Proposal 52: Support	Proposal 53: Support	Proposal 54: Oppose	Proposal 55: Support
Proposal 56: Oppose	Proposal 57: Support	Proposal 58: Support	Proposal 60: Support
Proposal 61: Support	Proposal 62: Oppose	Proposal 63: Oppose	Proposal 65: Oppose
Proposal 66: Support			



Submitted by: Pavel Kusnetsov

Community of Residence: Homer

Comment:

YES FOR PROPOSALS #52 #54 and

I dont agree taking away from small guys to favor big boats so No for proposal #54...

And YES for proposal #55

Proposal 52: Support	Proposal 53: Support	Proposal 54: Oppose	Proposal 55: Support
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PC78

Submitted by: Laurenti Kusnetsov

Community of Residence: Homer, ak

Comment:

I'm against big corporations let the small guys be able to feed they're family's

Proposal 52: Support

Proposal 53: Support

Proposal 54: Oppose

Proposal 55: Support



PC79

Submitted by: Dia Kuzmin

Community of Residence: Delta junction

Comment:

Hello board members

I submitted proposal 53 to allow longlining slinky pots in kodiak state waters for p.cod. I had the same proposal for cook inlet which for some reason wasn't on the agenda. My ask is to amend this proposal to a state wide proposal if possible if not add cook inlet. Thank you

Proposal 52: Support

Proposal 53: Support

Proposal 54: Oppose

Proposal 55: Support



PC80

Submitted by: Domian Kuzmin

Community of Residence: Delta junction AK

Comment:

I oppose against proposals 54. Why are big boats trying to take all the fishery away from small boats. Soon there is gonna be no fishery for little guys.

Proposal 54: Oppose

Proposal 55: Support



PC81

Submitted by: Faliley Kuzmin

Community of Residence: Homer

Comment:

That's the most [absurd] thing, cod starts showing up on shallows end of March

Proposal 54: Oppose Proposal 55: Support



PC82

Submitted by: Leontey Kuzmin

Community of Residence: Delta junction

Comment:

I'm against big boats and corporate taking away the ability from the small boats to feed there families

Proposal 52: Support Proposal 53: Support Proposal 54: Oppose Proposal 55: Support



PC83

Submitted by: Samson Kuzmin

Community of Residence: Delta junction A.K.

Comment:

I do not support the pot purposal.

Proposal 54: Oppose Proposal 55: Support



PC84

Submitted by: Fierce Kuzmin

Community of Residence: Homer, alaska

Comment:

This is stupid people only start fishing in march. & why no heads up on this proposal?

Proposal 54: Oppose Proposal 55: Support



Submitted by: Alexis Kwachka

Community of Residence: Kodiak, Alaska

Comment:

Chair Van Dort and members of the Board of Fisheries,

My name is a Alexis Kwachka I hold 3 limited entry permits, two for Kodiak waters and one for Bristol Bay. I am opposed to proposal 63. Permit stacking will lead to consolidation and without any study to even determine what the criteria of success or failure is? I respectfully ask you to oppose this action.

Limited entry permits afford an individual an opportunity to fish, fishing comes with no guarantee of success or failure. The State of Alaska demands active participation and this has been a success. Permit stacking decreases the permits available for next generation fishermen to purchase. Many studies have been done on the greying of the fleet and the lack of new entrants entering fisheries, this action will exacerbate an already defined issue.

Permit stacking is not done in a vacuum of just one fishery, each fishery that is allowed to stack will then excite the next fishery to ask for the same benefit. My case in point is that at almost all cycles now we see some sort of stacking proposal come before the Board of Fish.

During the last setnet stacking experiment we saw an influx of setnet fishermen move to Bristol Bay. That is everyone's right to do, I have no problem with competition. Where I really have a problem is when one individual can stack a permit into a child's name, wife's name, mother, father, family member, whomever's name and derive an income from that permit while competing against me. I have a serious problem with this. The reason being is because at the next cycle they will be coming before the Board of Fish asking for you to allow two permits to be allowed to fish under one individual. Permit stacking can/will lead to further consolidation. One fishery at a time.

Opportunity is a funny thing, one persons failure is another's opportunity. I bought into Bristol Bay during the last salmon upheaval. We had just come through salmon restructuring where permit stacking originated. Salmon prices were at an all time low market conditions were in the gutter and I bought. I took advantage of a bad time and took the risk and going for it. It has turned into half of my life fishing Bristol Bay. This season was my worst season I've ever had, but next season will be better. Any sort of consolidation that would have changed active participation would have taken half my fishing career in Bristol Bay away from me.

No matter the times active participation is pure and as protective of healthy coastal communities as you can get. One permit one fisherman, if you do decide to move forward with a proposal like this please tie the two fishermen together to both be actively participating with the harvest.

Also I think you should consider an:

- * optimum number study
- * understanding of already consolidated sites
- * criteria of success or failure of stacking
- * reconsider the bar a permit stacking proposal needs to meet before being elevated to an actionable item.

Thank you very much for your time and consideration of my thoughts. During these tough times for all of us in almost all of our fisheries, "less is not more"

Alexus Kwachka

Kodiak, Alaska

Proposal 63: Oppose



PC86

Submitted by: Cristina Lingvay

Community of Residence: Miami, Florida

Comment:

I am a fisheries management and conservation graduate student at the University of Miami Rosenstiel School of Marine, Atmospheric and Earth Science. As someone who studies fisheries management, it is my prerogative to be involved in changes regarding the management of fisheries throughout the United States, regardless of State of residence. I understand that fisheries management decisions greatly affect harvesters, who should be at the forefront of consideration to fisheries management changes along with the sustainability of the fishery.

The following include my comments and concerns regarding the proposed changes to the Kodiak Area Commercial Herring Fishery, which includes changes to Title 5, Alaska Administrative Code (AAC) 27.510 Fishing seasons and periods for Kodiak Area. There are two differing proposed changes to this regulation, which were introduced as Proposals 56 and 57 under the "Notice of Proposed Changes in the Regulations of the Alaska Board of Fisheries" on October 20, 2023.

Proposal 56

This proposal seeks to change the fishing season and periods for the Kodiak Management Area to increase commercial herring fishing opportunity by modifying (a)(1) above to the proposed regulation for (a)(1):

(1) Fishing periods for purse seines are from 9:00 a.m. until 9:00 p.m.

Proposal 57

This proposal offers a different change to the same regulation defined in Proposal 56 as follows:

(a) Unless provided for by emergency order, herring may be taken during the herring season from April 1 through Dec 31 as follows: A season, April 1 through May 15. B Season, October 1 through December 31.

The current fishing restrictions for pacific herring are undeniably complicated, going so far as to change by hour increments based on whether the day is even-numbered or odd-numbered and what month it is. As it currently reads, the regulation increases the potential for mistakes to be made in good faith, placing an undue burden on fishers. The individual who submitted Proposal 56 comments that the current operating hours are an "awkward artifact of the past" when there was less coordination between harvesters, processors, and ADFG. Additionally, the gillnet fishery in "all practicality no longer exists", increasing the potential for purse seine fishery harvest, and the regulation should be updated as such. The extension of daily fishing periods would facilitate a more orderly fishery, providing fishermen with more time to focus harvest on higher-quality fish. Lastly, the proposed change does not alter ADFG-designated harvest volume and biomass and does not seek to increase exploitation rates. While this proposal would greatly simplify the allowed times for purse seine fishing, it still substantially increases the period of allowable fishing without properly addressing potential over-harvesting

concerns that come with allowing more time for harvesting. The proposal fails to quantify the decline in the gillnet fishery to justify the proposed increase of purse seine fishing.

The individual who submitted Proposal 57 provides slightly different reasoning for their proposed changes, stating that the sac roe market for herring has been in decline, while current demand trends for canned, pickled, and smoked herring require herring harvest to take place when the herring is in its high fat stage of life 5-6 months past spawning. This is reflected in why the writer chooses to replace “sac roe” with “herring” in Proposal 57. The proposer cites the 2022 Study of North Sea Herring to advise the needs, uses, and market placement of the Kodiak fall herring of Proposal 57; but upon inspection, this document is a market study conducted by the Alaska Seafood Marketing Institute, and does not address the stock and estimated biomass production of pacific herring as is standard in fisheries management decisions, but rather investigates the market and perceptions of harvesters, processors and consumers of European Atlantic herring. This document is inappropriate to use in regulations pertaining to an entirely different species of herring and should not be used to justify why the herring season should be extended by 6 months and the regulations on allowable daily hours removed. The proposer offers no scientifically backed justification on why the herring season should be expanded as far as it is proposed.

It cannot be denied that the current regulation on purse seine herring fishing is convoluted and confusing. If current market trends are indeed changing towards demand for adult herring over sac roe, and the allotment for gill-net herring fishing can be better utilized by purse seine fishers, there may be a better method of regulating pacific herring. Moving the herring season to late summer and fall would also allow for additional recruitment of herring to the population, since roe would not be harvested. However, neither proposal sufficiently addresses the management concerns associated with such a change.

I propose that the amount of herring biomass that goes unharvested by gill-net fishers within the past 5 years should be quantified and assessed, and the allotment of biomass for each fishery should be reevaluated according to the findings. Additionally, market trends and demand for different herring products should also be studied to justify changing the herring season from spring to fall. Not only would this change more efficiently address demand for herring and reduce undue burden on fishers from convoluted regulations, but this change would also allow higher rates of recruitment for herring, ultimately benefitting the herring population and provide greater support for the north Pacific marine food web.



PC87

Submitted by: David Little

Community of Residence: Village Islands, Uganik Bay, Kodiak, Alaska

Comment:

Dear Board of Fish Members,

I am writing you regarding the Kodiak salmon proposals. My name is Dave Little and I have been setnetting in Uganik Bay on Kodiak's west side since 1984. I seined in Kodiak for a couple of years prior to that. I live in Village Islands, a small community in the bay, and everyone in the community is connected to the salmon fishery. Obviously, I'm not young but there are young people who are working hard to make a living and make payments on their fishing operations. My crew members are typically young Alaskans from the interior. It is evident that setnetters on the west side have been catching a decreasing percentage of the overall area catch. I am supporting simple proposals that may help mitigate these losses while having minimal impact on local

seiners, many of whom are my friends and neighbors. These proposals are as follows. Proposal 62 gives an advanced opening for setnetters under certain situations and while it states 48 hours I would be content with 24. Number 64 regards to hook size, the configuration at the outer end of our nets, increasing it from 25 to 50 fathoms. It will likely lead to a slightly more workable hook which would be convenient. And I support proposal 71 regarding outer Karluk. I am opposing proposals 72, 73, and 74 which will make it more difficult for us to be productive. Lastly, I have thoughts regarding a couple of other proposals. With number 63, I think a setnet fisherman having two permits will have minimal if any negative impact and could be helpful for a few people. Proposal 66, which will effectively increase seine length, will likely be a convenience for seiners, perhaps save them a little money, and minimally increase their catches. I don't oppose this proposal, but perhaps some increase in our net length would be in order (e.g., 25 fathoms).

In summary, it has become increasingly difficult for many Kodiak salmon fishermen to make a living, particularly west side setnetters, and I am hopeful that some simple changes that might help us make ends meet without having significant impact on other gear types.

Thank you for considering these issues, and for your hard work.

Sincerely,

David Little



COMMENTS REGARDING BOF PROPOSAL #57, KODIAK HERRING

I AM OPPOSED TO THIS PROPOSAL.

I hold a CFEC limited entry permit in the Kodiak food and bait (F&B) herring fishery, issued to me for my historical participation in the fishery prior to the time the Entry Commission determined a need to limit the number of permits after public hearings and deliberations. The number of permits was determined after careful analysis of the resource and the harvest capability of the fleet. In the final seasons prior to limited entry, there was an increase in the number of boats fishing and ADF&G food and bait herring Managers found it difficult to control the harvest, in part because they lacked resources to monitor the catch from the fishing grounds. That same lack of resources exists now, with ADG&G soliciting bids for F&B herring to generate revenue for the Department (*see Advisory Announcement, Food and Bait Fishery Update # 01, dated 10/3/23*).

Since the adoption of limited entry, ADF&G Kodiak herring Managers have continued to be concerned about over harvesting of herring stocks and have not allowed a competitive fishery for food and bait permit holders. As an alternative, the nine permit holders have been allowed by ADF&G and CFEC to form a co-op (*see Kodiak Area Herring Fisheries Annual Report number 19-30*), under which fishery Managers have seemed more comfortable in their ability to prevent exceeding the GHF during the open period of September 1-February 28 of each season, and as a condition of opening the fishery, they have insisted on the consent of all permit holders to a combine and that only one catching vessel operate.

During these combine years of the fishery some of the initial recipients of limited entry permits, who had taken turns as the catching vessel, apparently found it more profitable to sell those permits and leave the fishery. It is noteworthy that the author of this Proposal 57 was awarded a F&B herring permit at the inception of limited entry, had the opportunity to develop a food market as an active participant, but instead sold that permit.

Food and Bait permit holders welcome any food marketing contacts or information from ASMI or any other source, however, up to this point fall herring has been given out over the years to promote food markets without any actual sales resulting, mainly due to prohibitive processing and shipping costs.

This proposal is a bit vague about who would be allowed into a "B" season, however, if any Kodiak sac roe herring purse seine or gillnet limited entry permit holder were to be allowed to fish in the F&B fishery it could potentially make the fishery unmanageable. Again, ADF&G has insisted on our limited entry F&B fishing to be undertaken only under a co-op with only one catcher boat.



Kodiak herring permits, both sac roe and food & bait are limited entry, and they have been bought and sold. This proposal, if passed, would devalue *F&B* permits and increase the value of sac roe permits.

It would not be fair or equitable to increase the number of permits allowed to harvest food or bait herring without going through the process of petitioning CFEC for analysis and subsequent hearings.

This proposal requests that the BOF make drastic changes to the herring fishery and reallocate portions of the GHL from the sac roe fishery into a fall food fishery. Absent is any mention of the fall bait fishery. If roe permit holders were also allowed to harvest bait, it would essentially destroy the existing bait market for *F&B* permit holders, currently a viable fishery providing a service to other fisheries. It would also diminish the opportunity that currently exists for those sac roe permit holders who are not interested in fall fishing and rely on roe herring fishing in the spring.

I urge the Board of Fisheries to reject this proposal.

Dan Macdonald
December 19, 2023



Submitted by: Peter Macdonald

Community of Residence: Ancortes

Comment:

Proposal 57

I am opposed to this prosal.

There already exists a limited entry fishery for Food and Bait Herring in Kodiak. At inception of this limited entry fishery the department that only nine permits would be issued based on historical participation and production. I was issued one and still retain it. Even at that small number the department determined that management of the fishery could only work if we formed a combine with only one boat harvesting the quota. This proposal only mentions using herring for canning, pickling, and smoking for this B season. It doesn't mention bait which the majority of herring harvested in the fall is used for. Would sac roe fishers also be allowed to fish herring for bait without having a limited entry permit for food and bait? If so this would be in direct conflict to the existing limited entry fishery.

It should also be noted that the author of this proposal was one of the nine original recipients of a limited entry food and bait permit. He later chose to leave the fishery and SOLD his permit.

Proposal 57: Oppose



Submitted by: Jonathan Madison

Community of Residence: Kenai, Ak

Comment:

Proposal 46: Support...we need to look at this method of legal harvest more in all our sportfish sockeye fisheries....once a legal limit is retained...angler has to stop fishing for the day.

Proposal 49: Do not Support...the Homer Charter Association the proposer of the 49 does not like the restrictions that have been placed on them and are trying to penalize other fisheries.

Proposal 44: Oppose

Proposal 45: Oppose

Proposal 46: Support

Proposal 47: Support

Proposal 48: Support

Proposal 49: Oppose

Proposal 51: Oppose



Submitted by: Riley Malmsten

Community of Residence: Santa Barbara California

Comment:

Dear Board of Fish Members,

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Sincerely,

Riley Malmsten

Proposal 62: Support
Proposal 72: Oppose

Proposal 64: Support
Proposal 73: Oppose

Proposal 70: Support
Proposal 74: Oppose

Proposal 71: Support



Submitted by: Fisher Mann

Community of Residence: Kodiak

Comment:

To the Chair and members of the State of Alaska Board of Fisheries;

I write in opposition of proposal 73.

1. Due to the mixed stock status of fisheries in the Kodiak Management Area, simply labelling salmon a specific stock in order to keep a management section open is a move from responsible management, and sets a bad precedent.

2. With setnet harvests in decline in the Kodiak management area, adding more fishing time in mixed stock seine harvest is a step in the opposite direction managers should be going. In my opinion, reducing seine fishing opportunity to allow mixed salmon stocks to travel to setnet fishing areas around the Kodiak management area is step number one to restore declining setnet harvest. It is not an allocative issue, 2 separate salmon fisheries exist in the KMA. Setnetters have multiple proposals submitted for this cycle, in my opinion allowing longer setnets without allowing harvestable surplus into setnet areas will result in very little change in the setnet fisheries harvest decline.

3. The Sturgeon river salmon stocks could easily be managed under EO authority to allow for terminal harvests in the event Sturgeon stocks are in great abundance per this proposal 73, however, I have had difficulty locating any management or monitoring of the Sturgeon river salmon stocks in Annual Management Reports and it did not appear on the latest ADFG Escapement memo which was published during the October 2023 work session.

What is the issue you would like the board to address and why? Under the current language in the management plan, the Sturgeon Section of the Westside Management Plan of Kodiak Island is managed in early years on Karluk pink salmon and late run sockeye salmon with no provisions for management of the Sturgeon River which has seen large returns in the past 2 even years. (2020, 2022) The proposed language would allow the Department of Fish and Game to effectively manage the Sturgeon Section for both Karluk and Sturgeon pink salmon so that during years of abundance those stocks can be fully utilized, while at the same time providing protections on even years where one or both stocks could be weak.

PROPOSED BY: Kodiak Seiners Association (HQ-F23-106)

I am opposed to creating a new management plan for this mixed stock seine fishery, by labelling salmon taken in the area as something else, when an EO terminal harvest area could allow for harvest of whatever the proposer claims is there.

Proposal 60: Oppose Proposal 73: Oppose Proposal 74: Oppose



PC94

Submitted by: David Martishev

Community of Residence: Homer, ak

Comment:

I oppose proposal 54. Just sad that the big boats want to take away from the little guys. I support proposal 55

Proposal 54: Oppose Proposal 55: Support



PC95

Submitted by: Joe Martishev

Community of Residence: Homer AK

Comment:

I support proposal 55 and appose proposal 54.

Proposal 54: Oppose Proposal 55: Support



PC96

Submitted by: Mihael Martushev

Community of Residence: Homer, AK

Comment:

No for 54 and yes for 55

Proposal 54: Oppose Proposal 55: Support



PC97

Submitted by: Zenon Martushev

Community of Residence: Homer

Comment:

Future jig fisher. Would like more quota thanks.

Proposal 54: Support Proposal 55: Oppose



PC98

Submitted by: Zenon Martushev

Community of Residence: Homer, alaska

Comment:

Future jij fisher, would like an opportunity to fish longer with out quota being rolled over. Thanks.

Proposal 54: Oppose Proposal 55: Support



PC99

Submitted by: Joe Mauer

Community of Residence: Kodiak, AK

Comment:

I oppose any new king salmon regs for Kodiak area. New regs are not based on science.

Proposal 49: Oppose



PC100

Submitted by: Joseph Timothy Mauer

Community of Residence: Kodiak, AK

Comment:

Proposal 45- Oppose- I believe that bait should be allowed when fishing in Kodiak freshwaters. Harvest of trout species is generally low and salmon are being fished to be retained.

Proposal 46- Support with amendments- I agree that allowing snagged sockeye in freshwater would likely decrease mortality of sockeye salmon, however if it were to be allowed, it should read that "Sockeye salmon may be legally harvested while hooked anywhere in the body in Kodiak Island

freshwaters. Only single hooks may be used for this activity." I also believe there should be some limitation on proxy fishing if it were to be opened to snagging and limits should remain conservative as harvest rates would increase.

Proposal 49- Oppose- I oppose this proposal because the Kodiak fishery is comprised of primarily British Columbia and West coast fish. Taking of these king salmon do not influence the Lower Cook Inlet run. The report "Genetic Stock Composition of the Commercial and

Sport Harvest of Chinook Salmon in Westward Region, 2014–2016" released in December of 2016 by ADFG confirms the initial statement made by myself. I also believe the Homer Charter Association does not have the right to restrict other area's fisheries.

Proposal 51- Support- The number of boat based transporters has exponentially increased in the past 10 years. Many of these commercial transporters place crab pots out for clients using their own sport gear or subsistence gear. Look at any hunting transport website and you will find a photo showing clients around a table of crab or pots full of crab/other shellfish. Per state regulations "An owner, operator, or employee of a lodge,

charter vessel, or other enterprise that furnishes

food, lodging, or sport fishing guide services may

not furnish to a client or guest of that enterprise,

subsistence-, sport-, or personal use-caught shellfish,

unless the shellfish:

1. Has been taken with gear deployed and retrieved by the client or guest;
2. Has been taken with gear that has been marked with the client's or guest's name and address; and
3. Is to be consumed by the client or guest or is consumed in the presence of the client or guest."

I can guarantee that boat operators are not letting clients run hydraulics and throwing pots overboard, nor are they writing the names of each client on the buoys. I feel that this is not well enforced and it really cant be enforced because there are a limited number of troopers that can devote time to this. Additionally, many of the transporters do not return to a home port but rather have clients flown to them. I believe a better solution would be to prohibit commercial transporters from this activity in its entirety.

Proposal 44: Oppose
 Proposal 47: Support
 Proposal 50: Support

Proposal 45: Oppose
 Proposal 48: Support
 Proposal 51: Support

Proposal 46: Support With Amendments
 Proposal 49: Oppose



PC101

Submitted by: Paul McFarland

Community of Residence: Kodiak, AK

Comment:

I'm a lifelong fisherman in Kodiak and grew up seining salmon with my dad. I'm a seine permit holder and aspire to buy my own seine operation in the near future. I have also setnetted in Viekoda Bay, where the seiners had little effect on the fish that came in the middle of the bay before heading to the shoreline and swimming into our net. Half the time, no seiners are even fishing anywhere near there. It seems like the setnetters are just blaming the seiners for their recent lack of success without any good reason. I'm strongly opposed to the proposals that would limit the seine fishery and would be bad for harvest of local stocks. I believe that the Kodiak Seiners Association has the best interest for the town of Kodiak as we need to keep our boats fishing. In particular I am definitely against proposals 62 and 70 which would drastically harm our local fishing fleet. I am also opposed to the Inner Karluk proposal 68 which would destroy our whole red fishery based on arbitrary numbers selected by one member of the public.

Proposal 60: Support

Proposal 62: Oppose

Proposal 68: Oppose

Proposal 70: Oppose



Submitted by: Richard (Rick) Metzger

Community of Residence: Custer Wa. and Alitak Alaska

Comment:

Dear Board Members

Please consider my comments in support of proposals 63 and 64 and opposition to 66.

After participating in the Kodiak salmon commercial fishery for 62 consecutive seasons and of being an original limited entry recipient of beach seine, purse seine and set net permits I off these comments and observations.

Proposal 63 (support)

Our family has a 3 generational set net operation in the Alitak District. Over the years we have transferred permits back and forth between family members and associates to keep gear in the water with jobs for local crew members. Over the years we have developed the equipment, gear and skill to operate one permit by one man. It takes 2 or 3 to efficiently and safely operated 2 permits.

The economics and commitment of time now make it impossible for all family permit holders to participate. Some say its time to break up family dynasties and spread the permits to new entrants and that consolidations are bad. I disagree, look around the entire industry is consolidating. In 2023 about 1/3 of all Kodiak set set permits were not fished and very very few standalone permits were sold.

Our permits are the family jewels and we are not going to sell into a depressed market to carpetbagging speculators. Bottom line if proposal 63 fails 2 long term skilled local crew will not have a job at our camp in 2023.

Proposal 64 (support with amendment)

The harvest percentage of set net fish in the Kodiak area has steadily declined over the years mostly due to management, advancements in seine boat size and hp, gear and equipment and skill. The set net fishery is operated very nearly the same now as in 1940.

An increase in the length of and how the seaward end of a set net can be configured may possibly (or not) increase the efficiency of catch of the fish that come in contact with the net.

I would like to offer an amendment to allow a 50 fathom portion of the seaward end to be anchored, drifted or towed in any configuration.

Proposal 66 (oppose)

I participated in the Kodiak seine fishery for many of my 62 seasons. I used a lead on both shoreward and seawards ends. The large mesh lead web works well for its intended purpose of leading fish off the beach into deeper water and the capture net.

Most leads are now sewn to the seaward end to extend the reach of the seine but it is sometimes difficult to hold the fish in the large mesh web when they are crowded or the net is under hard tow. Evidenced by larger fish often gilled in the lead web.

Changing the allowed mesh size WILL increase the reach and efficiency of sein gear and further reduce the overall percentage of set net caught harvest in the Kodiak area.

The Kodiak seine fleet has already eaten it's self with bigger boats, advancements in gear and technology and skill levels evidenced by the number of latent permits in the fishery. Their harvest percentage continues to go up while participation declines.

A better solution might be to put the leads back on the shore end by setting into the beach and allowing the skiff and boat to swap ends during the tow and spinning the boat at closing of the set to draw in the lead web first. It works.

Proposal 63: Support
Amendments

Proposal 64: Support With Amendments

Proposal 66: Support With



PC103

Submitted by: Tollef Monson

Community of Residence: Kodiak

Comment:

Dear Board of Fish Members,

This year is a critical year for set netters in the West side of Kodiak at the BOF. Since 2012 I have seen a substantial decline in the overall health of our set net fishery although I have been a Kodiak set netter every summer since 2001. Without help from proposals 62, 63, 64, 70, 71 we will see our grey haired fishermen retire without new people to come in behind them for lack of being able to catch fish and make a living. The knowledge will fade and further erode the loss of culture in Kodiak and Alaska.

Many of us setnetters or in most professions can't just jump up and leave to join another fishery like Bristol bay without money in the bank. Since we have been in many consecutive hard years, our savings dwindle and we become more financially fragile. I have fished many other Kodiak fisheries on different boats as crew so I don't want to take away from seiners or boat owners who have worked hard to get where they are but I do believe that there is room for both gear types. Fish run patterns have changed and we can't move to chase fish with 15, 150# anchors and even bigger mooring anchors. The Board can help us gain some of our equity in fish back without hurting the seine fleet. Unfortunately, as setnetters we lack the ability to execute other fisheries with our infrastructure.

In the 20 years I have been at my site we generally catch 5 or less kings a year and almost nothing for non-Kodiak sockeye. More time in the water for setnetters isn't going to drastically impact any runs in different areas of the state nor on the island. We catch so few of the fish going by. I have many hundreds of hours of GoPro footage of salmon swimming into the hook end of our net and back out to go on their way. It is ineffective, yet one of the most iconic Alaskan connections to ocean and remote land.

For many of our crew it is the highlight of their formative years and changes their perception of the planet we all live. It's important to have these ambassadors return to the concrete jungles and tell of Kodiak remote multi-generational people still able to make a living through simple types of gear.

I am opposed to seiners getting more fishing time through proposals 72, 73, and 74 as it would in the end reduce set net fishing time by catching more fish before escapement has been fulfilled. 74 would be particularly damaging by congregating seiners into specific bays rather than waiting and spreading them out.

66 needs to be passed for the seiners to help them simplify the amount of stuff being packed into a small boat.

Thank you, Tollef Monson

Proposal 54: Oppose
Proposal 64: Support
Proposal 72: Oppose

Proposal 55: Support
Proposal 66: Support
Proposal 73: Oppose

Proposal 62: Support
Proposal 70: Support
Proposal 74: Oppose

Proposal 63: Support
Proposal 71: Support



PC104

Submitted by: Aleksandro Murachev

Community of Residence: Homer Alaska

Comment:

i oppose 54, and support 55

Proposal 54: Oppose

Proposal 55: Support



PC105

Submitted by: Doreece Mutch

Community of Residence: Kodiak, Alaska

Comment:

Board of Fisheries,

I am opposed to proposal 57. This proposal is based on the assumption that increasing the amount of Food and Bait Herring available for harvest will create new markets for food herring. This is not the case in most Alaska fisheries, including salmon, pollock, black cod, halibut, and flat fish. Our Alaskan fisheries have plenty of supply but are facing significant challenges on the market side. It would be irresponsible to take from the current viable Kodiak Food and Bait Herring Fishery for the POSSIBILITY of creating new markets which do not exist today. If there were viable food markets the already existing Kodiak Food and Bait Fishery would be utilizing them. The Dutch Harbor and S.E. Food and Bait Fishery have been leaving 1000's of tons unharvested. If there was a herring food market it would have been capitalized on by those fisheries already. Kodiak Seiners have participated in the Dutch Harbor Food and Bait Herring Fishery in the past and they would do so today if there was a market for the unharvested quota. The present guideline harvest levels are too low to allow all the existing Kodiak Food and Bait Herring permit holders to participate. A solution moving forward is to roll over any unharvested herring from the Spring Sac Roe Season into the already existing Fall Food and Bait Fishery. This could allow more of the existing permit holders to participate, and it doesn't take from any of the present stakeholders.

I bought my limited entry Kodiak Food and Bait Herring Permit at market value and Proposal 57 would devalue my permit and make it worthless.

Thank you,

Doreece Mutch

Proposal 57: Oppose



PC106

Submitted by: Max Mutch

Community of Residence: Anchorage, Alaska

Comment:

My name is Max Mutch, and I am a third generation fisherman—born and raised on Kodiak. For the last three years I've worked as a crew member for the fall food/bait herring season, and for the last three years I've depended on this season to help pay the bills. It's a fishery that I truly appreciate the opportunity to take part in, especially because I get to do it with family. Because of my direct experience with the food/bait herring fishery, I think my perspective on the issues presented by Proposal 57 can provide some helpful insight.

Kodiak herring permits for both food/bait and sac roe fisheries are limited entry. The number of permits on the market is directly tied to the amount of fish being harvested. The amount of fish being harvested is determined by several factors but hinges on the market demand for product and the amount of fish that can be sustainably removed from the environment. For the last three years that I've fished the fall food/bait herring season, the quota has averaged about 800 tons, and it only takes us around twelve days to reach that quota. The fall food/bait herring fishery simply isn't large enough to justify increasing the number of available permits. This fishery is currently operating efficiently and effectively, so why would we change a system that is running so well?

There has been some discussion that increasing the number of available food/bait herring permits or absorbing food/bait and sac roe into one permit would open the market up for food herring, as well as allow boats to catch their own bait for other fisheries. Not only would either of these options destroy the value in the current market for food/bait herring, but there is a lot of uncertainty and room for error. First, there is the very real possibility of over-harvesting. Second, there is the fact that the food/bait herring season in the fall is fished with completely different tactics than the sac roe season in the spring. Lastly, there is no guarantee we could jump-start a food herring market. Several Alaskan fisheries are already having difficulty selling all of their stocked product.

I do, however, personally love smoked herring kippers, and I think it would be a huge win for Kodiak if we could find a way to market our herring for food. Immediately increasing the number of available permits for bait/food herring is not the way to do this. If we want to test the market, take a small sample from the current quota, and see what happens.

In summary, the food/bait herring fishery is currently a highly successful fishery, and allowing sac roe permit holders to fish the food/bait season or increasing the number of available food/bait herring permits would destroy the value of the current food/bait herring market. The current quota for food/bait herring isn't remotely large enough to support additional permits, as it isn't even large enough for all the current permit holders to fish the season. Several Alaskan fisheries are already struggling. It doesn't make sense to risk losing an already

successful fishery for the possibility of starting a food market from scratch. On a personal note, the fall bait/food herring fishery is my job. It's my livelihood, and I don't want to see that go away. Thank you for your time.

Proposal 56: Support

Proposal 57: Oppose

State of Alaska

Board of Fisheries,

I am opposed to Proposal 57

There are two separate, limited entry Herring fisheries in Kodiak. The distinguishing factor that separates the Sac Roe Fishery from the Food and Bait Season is the timing of the harvest, as they are several months apart. The BOF has the authority to change the season, but in this case changing the season as requested in proposal 57 would essentially be issuing more permits into the already existing fishery. Proposal 57 would also increase the gear size to match the much larger nets of the Food and Bait fishery. This proposal would create a lot of permits for a fishery that is already limited entry without going through the process we already went through in 2000 when the fishery went limited entry. There are over seventy Sac Roe limited entry permits and only nine Food and Bait limited entry permits. The impact on the value of existing Kodiak Food and Bait Herring Permits is a consideration that cannot be ignored. Proposal 57 asks to take 1,000 tons of herring from the Sac Roe quota and dedicate it to the new food and bait season. This action has two major issues. The first issue is that the Sac Roe season has been harvesting almost all its quota annually except for 2023. (2023 should not be used as a barometer for managing decisions as most species markets are upside down leaving unharvested fish in almost every sector of Alaska's seafood harvest.) The average Kodiak Sac Roe Herring Quota is around 2,500 tons with much larger quotas in recent years. Proposal 57 asks to take 40% of that quota and allocate it to a food herring fishery that is nonexistent in Kodiak today despite efforts over the years to promote it by giving out tons of free herring as samples. 150 tons of cost recovery herring from the existing Food and Bait season has been available through ADF&G to anyone that wants to harvest it, no permit required. This would be an excellent opportunity for someone with a herring food market to access enough fish to show that a market exists before asking for quota from another fishery. No one with a food herring market has ever put in a cost recovery bid for these herring. The second problem with the proposal is that the additional quota added into the already existing bait herring quota would saturate the market. The market for these winter herring is limited, Proposal 57 would take market share from the existing fishery and do nothing to increase the market.

Our Kodiak Food and Bait fishery has come under some public scrutiny because of the low number of participants so I wanted to forward some data that shows it compared to the other two food and bait fisheries in the state based on the past four-year average.

Dutch Harbor Food and Bait Herring	3,837tons/yr.	3 permits or less	1,280 tons/permit
S.E. Food and Bait Herring	7,632tons/yr.	3.5 permits	2,180 tons/permit
Kodiak Food and Bait Herring	650/tons/yr.	9 permits	72tons/permit

The Dutch and S.E. fisheries are both open access. The Kodiak fishery is limited entry. I am providing this information because it shows, like we often see with limited entry fisheries, there are more permits in Kodiaks limited entry fishery than you would normally see in an open access fishery. It looks like both the open access fisheries fall short of catching their guideline harvest level, which supports the claim that the market for our winter food and bait seasons is limited.



When you consider this data and the fact that the local **ADF&G managers have only allowed one boat to participate** at a time it becomes clear why one boat has been doing most of the harvesting in our present food and bait herring fishery. CFEC created a limited entry program for our Food and Bait fishery because prior to 2000, the number of boats fishing had increased, and was still increasing, and the ADFG managers had found that controlling the catch to the guideline harvest level numbers was exceedingly difficult. Considering the fact that the department has only allowed one vessel to fish for food and bait herring, how is it a good idea to add more participants into the fishery, when the already existing limited entry fishermen are not allowed to participate?

The existing Food and Bait fishermen have never asked for more quota because the Sac Roe fishermen have been harvesting their portion, and the market to sell the Winter Food and Bait herring has been limited. I think it is reasonable to roll over any unused quota from the spring Sac Roe Season into the already existing fall Food and Bait fishery. This would allow more of the existing limited permit holders to participate in the fishery by having enough quota available to alleviate ADF&G's concern of overharvest.

Thank You

Sam Mutch

I am a permit holder and participant in both Kodiak's spring Sac Roe fishery and the fall Food/Bait Herring fishery for over twenty-five years.



Submitted by: Sydney Mutch

Community of Residence: Kodiak, Alaska

Comment:

I am a permit holder and participant in the Kodiak Food and Bait Herring Fishery. I am opposed to Proposal 57.

I believe it is critical that we reflect on the historical facts presented from this fishery to guide us toward making an educated decision that will protect environmental implications and future markets. In 2000 the Kodiak Food and Bait Herring Fishery was in turmoil due growing participants in the fishery and concerns of over harvesting. When the fishery was not limited entry there was not enough quota for all participants involved and the fishery managers were concerned with over harvest. As a solution the Kodiak Food and Bait Herring Fishery was transitioned into a limited entry fishery. This allowed Fish and Game to manage the harvest under their policy that only one boat was allowed to go out and fish at a time. A Co-op was formed that allowed all the permit holders to continue having a stake and profit in the fishery.

We have already witnessed that too many vessels can have negative implications on this fishery. I am in support of the current Kodiak Food and Bait Herring Fishery, and rely on the income from it. Moving forward with proposal 57 will devalue my permit and I am dependent on my income from this fishery. This proposal could also have lasting implications on the health of the herring stock when an influx of new participants enter making it difficult to manage and not over harvest.

I am always in support of developing new markets and opportunities, and I believe they should benefit the existing Kodiak Food and Bait Herring Fishery. New markets and opportunities will allow more permit holders to annually participate and fish at the same time.

Thank you for the time and thought that goes into making these decisions that protect our fisheries and benefit our communities.

Sincerely,

Sydney Mutch

Proposal 57: Oppose

Dear Board of Fish Members,

As a lifelong, 2nd generation setnetter in the Northwest Kodiak District and a lifetime resident of Kodiak, I am writing to express my strong support for proposals 62, 64, 70 and 71, submitted by the Northwest Setnetters Association.

The reason for the proposals is clear – we setnetters have been losing our share of the harvest and are now at the point where we are unable to make a living. Since 1980, my parents raised a family of 4 on the income from one setnet permit, including building a house and sending both my sister and myself to college. For the last several years (and this pre-dates the price catastrophe from 2023), I have barely been able to pay my crew in a way that is remotely fair for the amount of work they are doing. It is a good thing that I do not have family to support, but I have 3 young nieces who come out every summer to learn the ropes, and it makes me sick to think they won't have an opportunity to make a living at this when they grow up, should they choose.

Since officially taking over from my parents, (finalized in 2015), I have been working harder than ever to increase my harvest, and it is not working. Things I have done include decreasing my mesh size, trying different colors of web, using heavier or lighter leadline, utilizing monofilament web, pressure washing and volume pumping more, and going out on more picks per day. Despite these efforts, fishing at my site has gone downhill.

All the proposals attempt to help the setnetters regain some of the percentage that has been lost. Proposal 62 would help setnetters by allowing us extra fishing time at the front end of openings. With this separate management of gear types, which exists in other parts of the state, setnetters would have a chance to increase harvest percentage before the more efficient fleet begins harvesting. Proposal 64, allowing a larger hook, would possibly increase efficiency of the set gillnet fleet while not impacting the seine fleet. This is one of the only ways we can increase our efficiency, since bigger skiffs or more powerful outboards don't help our gear type catch more fish. Proposal 70 would provide a measurable, comprehensive tool to work with in attempting to regain equity. Proposal 71, mostly just housekeeping, could help Karluk escapement goals be achieved sooner in the season. Without some kind of handicap, we fear that we will go the way of other setnet fisheries in the state and just fade out of existence.

I am also opposed to proposals 72 and 73, which could have negative impacts on the opportunity of the set gillnet fleet and am strongly opposed to proposal 74. The proposal says it would increase harvest opportunity, but the absolute opposite is what would happen for setnetters. If any of these new sections were closed, setnetting would not be allowed in that section during that time. The Department of Fish and Game would not be able to provide pre-season forecasts specific enough for each of these sections, so that would mean that a setnet site could gear up for the season, hire crew, and then find themselves sitting idle the whole time. This would be unsustainable. If I knew there would be no fishing for a large chunk of the season, I could choose to do something else for income, but without being able to plan, I think this would be spell complete ruin for the setnet fishery. This proposal would be completely at



the expense of one gear type that is already struggling just to survive, while providing expanded opportunities for other gear types that have been seeing their historical percentage of the harvest go up already. I believe there are other ways to manage the fishery that don't imperil one gear sector.

Thank you for your time and your important service to our community and our state.

Sincerely,

Adelia Myrick
Kodiak Setnetter

Dear Board of Fish Members,

I have been a Kodiak setnetter since 1980, fishing with my family in Kizhuyak, Viekoda and Uganik Bays. I have lived in Kodiak, Alaska since 1971.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the central section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

Setnetting has been invaluable to our family, not only as our primary source of income but for the opportunity to be together. The children learned to work hard, appreciate the natural world, and become part of a team in the skiff as well as ashore. They learned every part of setnetting including tying knots, running a skiff, and net mending. Their crew shares helped my two children to attend college. I am grateful that one daughter has continued the fishing business and the other helps during the season. Now our grandchildren are taking part in the set netting life. I hope they can also earn enough to attend college and that the fishery will still be able to support our family.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,
Betsey Myrick



Submitted by: Rob Nass

Community of Residence: Kodiak, AK

Comment:

My father Fred Nass has been in the marine repair business for over thirty years, performing miracle after miracle to keep our friends and neighbors who fish in seaworthy condition. He and I both depend on the success of our wonderful fleet to harvest the bounty of the sea in a responsible and ethical fashion. If poor management effects the fleet, it effects the whole community. Kodiak is a world class fishing port that deserves to be treated as such.

-Rob Nass



Submitted by: Parry Nelson

Community of Residence: Kodiak AK

Comment:

I Support proposal 51. As a limited entry permit holder for Kodiak Tanner crab i do not think its right that boats doing other commercial activities should be able to harvest crab. Pretty much im being robbed of a resorce that i have invested alot of money to participate in!

First off March 25th is a terrible date to try to judge whats going on with jig effort and catch. its to early, but if thats the day that decides the fate of the Jiggers quota being taken away then going with 10% is obviously the fair choice.

The catch report from the 2023 season clearly shows that early season jig catches before march 25 th are slow but build substantially in april and would of likley kept consistant through May. Its not fair to give jig quota to the pot boats before getting a fair chance to catch it. supporting proposal #55 and setting the bar at 10% is fair for both gear types.

I am in support of proposal 55 and strongly appose 54. the Jig fishery is pretty much the last entry fishery that is easy to get into and is very important for small boats and young people getting into fishing. Jigging cod is best in April and May when the fish move into shallower water and weather becomes nicer and safer for small boats to fish. There should Not be a rush to catch the quota in the months of January-March! In 2023 there was minimal effort in the early months then in April the weather improved and the Jig fleet caught the quota on april 22nd. Going with the pot fishers proposed numbers would push jiggers to fish in unsafe weather and make the jig fishery far less profitable.

Proposal 44: Support

Proposal 51: Support

Proposal 54: Oppose

Proposal 55: Support

Proposal 62: Oppose

Proposal 63: Support

Proposal 64: Support

Proposal 70: Oppose



Preliminary Pacific

<http://www.adfg.alaska.gov/index.cfm?a>

All catch expressed

KODIAK

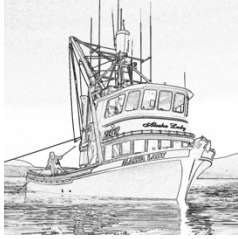
Vessel Count:

GHL Allocations:

Total	Pot	Jig
70	16	54
4,086,777 Pounds	50%	50%

GHL:	Pot		Jig		2,57
	2,043,389 Pounds		2,043,389 Pounds		
Week:	Landings	Catch	Landings	Catch	Landin
			- Opened 1/1/23 -		
Jan 1 - Jan 7			0	0	
Jan 8 - Jan 14			0	0	
Jan 15 - Jan 21			0	0	
Jan 22 - Jan 28			1	Confidential	
Jan 29 - Feb 4			0	0	
Feb 5 - Feb 11			0	0	
Feb 12 - Feb 18			0	0	
Feb 19 - Feb 25			1	Confidential	
Feb 26 - Mar 4			2	Confidential	- Op
Mar 5 - Mar 11	19	1,035,902	18	122,285	0
Mar 12 - Mar 18	29	1,139,165	18	93,054	1
Mar 19 - Mar 25			- Closed 3/15/23 -		0
Mar 26 - Apr 1			41	513,643	1
Apr 2 - Apr 8			48	509,828	1
Apr 9 - Apr 15			30	284,423	1
Apr 16 - Apr 22			40	408,715	0
Apr 23 - Apr 29			- Closed 4/22/23 -		0
Apr 30 - May 6					0
May 7 - May 13					0
May 14 - May 20					0
May 21 - May 27					0
May 28 - Jun 3					0
Jun 4 - Jun 10					0
Jun 11 - Jun 17					0
Jun 18 - Jun 24					0
Jun 25 - Jul 1					0
Jul 2 - Jul 8					0
Jul 9 - Jul 15					0
Jul 16 - Jul 22					0
Jul 23 - Jul 29					0
Jul 30 - Aug 5					0
Aug 6 - Aug 12					0





December 18, 2023

Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK. 99811-5526

Dear Chairman Moriskey and Board of Fish members:

My name is Thomas Nelson from Port Lions. I've been commercial fishing Kodiak since 1977.

Over the years I have witnessed many hardships within the commercial fishing community. Unwarranted proposals from the North and South of the Kodiak District has caused our fleet to lose valuable fishing time and more importantly income.

Now with proposal 70 it obviously is going to cause further division among the Seine and Set Net fleet. The Kodiak seine fleet is usually caught in the middle of disputes, and many times we don't voice or take a stand protecting our livelihood. Many don't seem to understand you can't have everything, but obviously this proposal seems to be based on wanting more, and if you feel you're not able to get a fair share, you want to make sure nobody else can have any. Salmon come in all sizes, and I understand if you use larger mesh to target Sockeye the smaller Pink may not gill. For the last few years on the West Side pinks have been gilling in my net, showing that these pinks may swim freely through a set net.

Over the years traditional sets have been lost to sites being placed there purposely to stop seine boats from earning an income. One particular site just made some boats fish closer to another site. Seine boats catch fish swimming in one direction while a set site may target fish in either direction. Many times, seiners hold behind set sites, and for the most part relations are good. With this unfair proposal, I feel it was produced in haste and possibly anger, not taking into consideration of what this could mean to many fishermen and their families on the Island. I understand it is your position to look at both sides of this proposal I respectfully ask that you take a firm stand against this ridiculous action that would put unnecessary hardships on not only boat owners but crew and their families as well.

Thank you for allowing me to voice my concerns over Proposal 70.

Sincerely,
Thomas E. Nelson Sr.
F/V Alaska Lady



Submitted by: Aaron Nevin

Community of Residence: Kodiak, Alaska

Comment:

My name is Aaron Nevin I am a commercial fisherman from Kodiak. I oppose proposals 62, 70, and I own the F/V Aquarius a 42 foot seine vessel built in 1971. I started fishing in 2001 when i was in junior high working on deck for my dad i continued fishing salmon with him every summer. I started running the boat for him in 2017 and in 2022 i bought the boat from him. The central section is an important area for a small boat like mine providing protected and productive places to fish. My business and livelihood depends heavily on my ability to fish this area. The allocation plan in proposal 70 could never work. This isnt a terminal harvest fishery like bristol bay.

Proposal 61: Oppose
Proposal 68: Oppose
Proposal 73: Support

Proposal 62: Oppose
Proposal 69: Oppose

Proposal 66: Support
Proposal 70: Oppose

Proposal 67: Oppose
Proposal 72: Support

**NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.**

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

December 26, 2023

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

dfg.bof.comments@alaska.gov

RE: **NSRAA Support to withdraw Proposal 59 from Kodiak BOF meeting**

Dear Chair John Wood and Board of Fisheries Members,

I am the General Manager of The Northern Southeast Regional Aquaculture Association, or better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement projects. My comments represent our 25-member board, and the fishermen they represent, made up of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and interested persons from our region. Our board has broad representation from our region and at our Fall November 9th, 2023, meeting our board passed a **unanimous** resolution, with no abstentions, **strongly opposing** proposal **59**. Since that time proposal **59** has been withdrawn from consideration at the Kodiak Meeting.

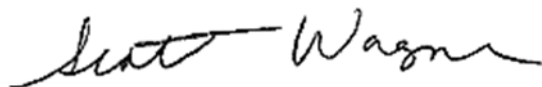
NSRAA supports the BOF action at the LCI meeting in withdrawing Proposal 59 from future board consideration. This proposal was significantly modified from the original proposer submission which greatly expanded the impact of the proposal to a specific facility, to hatchery programs statewide. Prior to the LCI meeting Proposal 59 was listed on the Kodiak BOF meeting page as a Statewide proposal. Since the LCI meeting the proposal has been re-edited and is no longer listed as a Statewide proposal.

Proposals nearly identical to Proposal 59 have been submitted 7 times over the years by the same proposers. These similar proposals have been submitted in regions spanning from Southeast to Prince William Sound, to Lower Cook Inlet. None of these proposals have been acted upon by the BOF.

Proposal **59** in its original form, or current posted version, is punitive in nature and does not attempt to address **any** allocation issue in the Kodiak area. The proposal, whether intentional or not, would have tremendous financial impacts for the Kodiak Regional Aquaculture Association, the hatchery operator of the Kitoi Bay Hatchery. These impacts would be felt by commercial, sport, subsistence, and personal use fishermen of the region. The result would be in a reduction and likely elimination of most enhanced salmon production in the area.

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

Sincerely,

A handwritten signature in black ink that reads "Scott Wagner". The signature is written in a cursive, flowing style.

Scott Wagner
General Manager

Northwest Setnetters Association Supports Proposal #62 – Additional Fishing Time for Setnetters

Proposal 62 adds additional (front-end) fishing time for set gillnetters in the Central Section. West side set gillnets may only operate in the Central Section while other gear types have over 50 other Sections available to them at various times. Under current regulation, when the Central Section opens, all gear types open at the same time and for the same length of time alongside each other.

Setnet operations have tried to modify their operations to become more efficient in recent years. Many sites have invested in various sizes of web and reduced mesh sizes down to 4-3/8" gear, at different times of the season, attempting to catch smaller fish. We have increased pressure washing activities to keep gear clean and are utilizing single filament web to combat algal blooms. All of these attempts have not proven to turn set gillnet harvest numbers around to historical percentages; rather, percentages have continued to decline.

Meanwhile, other gear types are increasingly more efficient. Their harvest capabilities are quicker, vessels are more capable of continued fishing in bad weather, and capacity is expanding to continuous harvest during open periods, all of which diminish opportunity for fixed gear types.

Set gillnetters need a regulatory change to help the historic gillnet fleet survive. Given our fixed gear structure and singular area, additional time in the water without competing gear types is the best means to regain some of what we have lost, to continue to be viable, and to be able to hire, retain and pay crew at a fair wage.

To arrive at the 48-hour additional fishing time for this proposal, members of the NWSA took an average of their first day's delivery on each opening for the past 5 years, and looked at what additional time would be required to raise our harvest closer to historical levels of equity. Using this method, 48 hours would get us closer to our historic levels, but still not actually regain all that we have lost.

Northwest Setnetters Association Supports Proposal #64 – Modified Setnet Hook

Northwest Setnetters Association Proposal #64 is a small gear modification to Kodiak set nets. The intent of Proposal #64 is to increase the efficiency of the Kodiak set net. It does not change the length of the set net but only increases the number of fathoms used for the hook configuration. The hook of a Kodiak set net is traditionally at the offshore end of the set net and is shaped to turn fish around and gather them until they get caught in the net. Proposal #64 is requesting that the amount of set net web presently allowed to be used for the hook configuration be increased from 25 fathoms to 50 fathoms.

Each Kodiak set net permit allows 150 fathoms of set net web with up to 50 fathoms of non-fishing lead web from low tide of the day to enable a set net to get away from surf, rocks and obstructions on the immediate shore where a set begins or is attached. Several of you present Board members were able to see Kodiak set nets when you flew over the West side of Kodiak last June.

Kodiak set netters are attempting through Proposal #64, as well as our other proposals, to increase our failing share of harvest. We believe this change in allowable numbers of fathoms used in the hook configuration could be helpful. Last Board of Fish cycle we successfully passed the usage of monofilament in our set nets. That has been helpful to some set netters but has not made a meaningful increase in efficiency. Proposal #64 would also make a small increase in efficiency without being a significant change in the fishery.

Northwest Setnetters Association Supports Proposal #70 - Allocation

1. The problem that Proposal #70 addresses. The percentage of the sockeye salmon harvested by Kodiak's West side setnetters has fallen from an average of 55% in the years 1990-2012 to 33% in the years 2013-2023. The

percentage of pink salmon harvested by West side setnetters has declined from an average of 30% in the years 1990-2012, to 17% in the years 2013-2023. The rate of decline has increased dramatically in the last 5 years. This lost setnet catch share of both species is now caught by the seine fleet, a slow but steady de-facto allocation of salmon from one gear group to another.

2. Result of lost catch share for setnetters. This loss of catch percentage by West side setnetters has translated to a precipitous loss of income. This has made it increasingly difficult to gear up for a four-month season, or to find crewmembers willing to fish for increasingly low earnings. If this loss of catch share is not reversed and restored to previous equitable levels, the number of setnetters who can operate profitably will continue to fall and the demise of Kodiak's westside set gillnet fishery will be assured.

3. Possible causes of the problem. By regulation since the 1970s, Kodiak's West side set gillnetters may fish only in the Central Section of the Northwest Kodiak District, a mixed gear area where setnetters and seiners fish simultaneously during openings. Seiners may fish in areas north and south of the Central Section, in the Central Section, and in seine-only terminal areas after the fish pass through the Central Section.

Despite this inequity in fishing area, the percentages of fish caught by seiners and setnetters remained relatively static for decades after Limited Entry in 1974. Since 2012 however, the percentages of fish caught by setnetters has fallen dramatically. If allowed to continue, this accelerating trend spells the end of Kodiak's West side setnet fishery.

We believe the de-facto allocation of fish since 1990 from setnetters to seiners since is caused by various things:

1. Increased seine fishing efficiency.
2. Changing fish migration patterns, which may be causing a redistribution of salmon by gear type.

4. How an allocation of salmon would address the problem. Proposal 70 would allow managers to use separate time and area openings for seiners and setnetters to aim for historic catch percentages between the two gear groups, while also managing for escapement. An allocation plan would work best if catches and allocation targets were tracked on a daily basis, together with escapement goals. This has been successfully accomplished in other areas of the state with mixed gear fisheries. If one management method failed to reach allocation goals, another could be tried, until the most useful tools, either singly or in concert, are identified and used in the years going forward.

An allocative plan would use the West side Management Plan, which since the 1990s has comprehensively managed salmon in the mixed gear Central Section, the seine only terminal areas of the Northwest Kodiak District, the seine only Inner and Outer Karluk sections of the Southwest Kodiak District, and the seine only Telrod Cove Special Harvest Area. If all these areas managed with the West side Management Plan are not included in an allocation plan, it is likely that the percentage of fish caught by West side setnetters will continue to fall.

5. BOF Authority to Use Allocation to Address the Problem. The Board of Fish has the authority to allocate fish in Alaska between gear groups using historical, cultural, and economic criteria. Kodiak's West side setnet salmon fishery is historically, culturally, and economically valuable to Kodiak and the State. We therefore believe it is appropriate and necessary for the Board of Fish to allocate Kodiak's West side salmon in order to restore the historic percentages of catch share between seiners and setnetters, and thereby ensure the survival of the setnet fishery.

Northwest Setnetters Association Supports Proposal #71 – Allows More Flexibility in Outer Karluk Early Run Sockeye Management.

Proposal 71 provides better flexibility to the Department of Fish & Game to manage early run sockeye returning to the Karluk River and reduces the risk of over harvesting during weak returns. By allowing the Department to keep the Outer Karluk section closed when managing for Central Section openings, this proposal also provides needed relief to chinook salmon upon entering the near terminus waters during peak run timing of mid-June through mid-July.

Northwest Setnetters Association Opposes Proposals 66, 72, 73 and 74 – All of these Proposals would decrease setnet fishing opportunities in the Central Section of the Northwest District.

Proposal 74 would divide the Central Section into three separately managed sections, each of which could be opened or closed depending on escapement to local rivers. This scheme would divide the West side setnet fleet into three separate management areas and concentrate the seine fleet in those sections that might remain open, while keeping setnetters shut down in those areas that remained closed.

Proposals 72 & 73 would increase seine fishing on the West side of Afognak and at the Sturgeon River, thereby cutting off fish traveling from the north and south to setnetters in the Central Section. These two proposals could also impact escapement numbers, which could result in reduced Central Section fishing time in August.

Proposal 66 would allow the currently allowed 50 fathoms of seven-inch seine lead mesh to be hung with three and a half inch mesh. Seinners maintain this would provide a cheaper web option and would only minimally increase seine efficiency. However, this modification would extend the currently allowed 200 fathoms of 3 ½ inch seine mesh to 250 fathoms, thereby reducing the number of fish available to setnet fishermen fishing behind those seine nets.

Thank you for your time and consideration.

Respectfully,

Northwest Setnetters Association Board of Directors

Dear Board of Fish Members,

My name is Erik OBrien, Uyak Bay, Kodiak Setnetter, resident of Larsen Bay, and author of Proposal 69 (5-2 Setnet Periods)

69 proposed a 5-2 setnet fishing schedule for the Westside Setnet fleet and received broad support, although it possessed a detrimental error in that it required the Department to allocate fishing days, which is not their burden. This error can be corrected by **identifying a “benchmark” which anchors a setnet “goal” to in-season harvest**. If setnetters traditionally harvested 50% of the westside sockeye and 30% of westside pinks, that could trigger additional days to the Westside setnet fleet, up to a weekly 5-2 schedule. A percentage of the benchmark could be set, such that 70% of the benchmark would allow up to 5 fishing days per week, 80% - 4 days per week, 90% - 3 days per week, etc. These numbers would need to be developed in partnership with the Department to ensure the protection of escapement goals. A scenario that could trigger this would be sockeye traveling up the southwest end of the Island or small pinks, both scenarios that limit the ability of the Setnet fleet to harvest the *benchmark* allocation. In this case, the **Department would follow the benchmark goals to trigger additional setnet days while also managing the seine fleet for maximum harvest to ensure escapement goals**.

In conversations with several members of the seine fleet, we discussed an appropriate start date for this proposal. After thinking about this in concert with those seiners, **a more effective period for the 5-2 trigger would be the July 4 -August 24 mixed stock management periods**. The majority of that time is already managed on a weekly schedule.

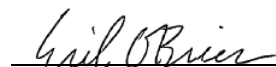
A fair mechanism to trigger additional setnet days without limiting the seine fleet is the most important issue facing the Kodiak Setnet fishery.

Proposal 64, allowing larger hooks, is probably one of the most important gear modifications we can make to improve efficiency. This proposal received very little to no opposition, and I hope you will pass this attempt to affect our own ability to improve harvest efficiency without affecting adjacent gear types.

Proposal 63, allowing permit stacking, would allow increased operational efficiency, although some members are philosophically opposed to this proposal; however, looking at the dynamics, it is the family operations that would most benefit from this change. I support family fishing operations and support this proposal.

Thank you for your consideration.

Sincerely,



Erik OBrien

David O'Brien

[REDACTED]
Kodiak AK
[REDACTED]

12/23/23

Chairman John Wood
Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Proposals 63 and 64

Dear Chairman Wood and Board of Fish members:

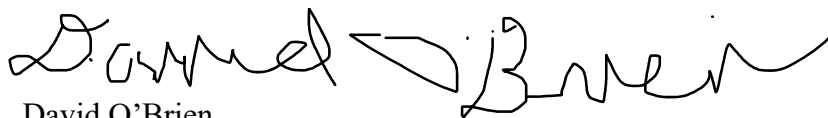
Thank you for the opportunity to comment on proposals for the upcoming Kodiak Board of Fish meeting. My name is David O'Brien, and I am a new entrant into the Kodiak seine fishery as I bought a seiner in 2020 and fish Kodiak after going to Bristol Bay during June and the first part of July. I am writing in **support of proposals 63 and 64** and in **opposition** of proposal **62 and 70**.

Proposals 63 and 64 are a great example of proposals by the set net fleet that directly advocate for the setnet fishery, while providing no direct negative impact to the seine fleet. These proposals will undoubtedly allow more harvest for the setnet fleet without directing management time or area away from the seine fleet.

Proposals 62 and 70 are concerning as they are based on the premise that seiners are the reason for the decline in setnet harvest, which is not factual. Fishing days matter to seiners the same as they matter to the setnet fleet, especially in a fishery like the Kodiak fishery where we scratch away at multiple species during a comparatively long season. I am not in favor of losing fishing days after investing a substantial amount of savings into the fishery. There also is no guarantee that any fish allocated away from seiners will actually be harvested by the setnet fleet potentially leading to lost opportunity and over escapement.

In conclusion I urge the Board to be cautious making changes to the Westside Management plan without fully comprehending the impacts they could have on sustainability and yield.

Sincerely,



David O'Brien



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:
OSM 23143

DEC 22 2023

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

Dear Chair Wood:

The Office of Subsistence Management (OSM), working with other Federal agencies, has reviewed the 31 proposals being considered at the Alaska Board of Fisheries Kodiak Finfish meeting January 9-12, 2024. The attached comments from OSM regard proposals that are likely to impact federally qualified subsistence users or associated fisheries resources within Federal subsistence management jurisdiction. Other proposals being considered may affect Federal subsistence fisheries and users. Most of these other proposals involve fisheries that are outside of Federal jurisdiction and some of them involve areas of overlapping State and Federal jurisdiction. Adoption of these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. OSM may wish to comment during the meeting on other items that impact federally qualified subsistence users.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director

Enclosure

cc: Federal Subsistence Board
Interagency Staff Committee
Benjamin Mulligan, Alaska Department of Fish and Game
Art Nelson, Alaska Department of Fish and Game
Mark Burch, Alaska Department of Fish and Game
Administrative Record

RECOMMENDATIONS

ALASKA BOARD OF FISHERIES PROPOSALS

**Kodiak Finfish
January 9–12, 2024
Kodiak, Alaska**

Office of Subsistence Management (OSM)

PROPOSALS 44 and 45

5 AAC 64.030. Methods, means, and general provisions – Finfish.

Proposal 44: Prohibit multiple hooks in Kodiak Island freshwaters as follows: In all freshwaters of Kodiak Island only a single hook may be used for sportfishing.

Proposal 45: Prohibit bait and multiple hooks in Kodiak Island freshwaters as follows: In all freshwaters of Kodiak Island only single hook artificial flies or lures may be used for sportfishing.

Current Federal Regulations:

50 CFR §100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions

* * *

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a “barb” means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

* * *

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

* * *

50 CFR §100.27 Subsistence taking of fish.

* * *

(b) Methods, means, and general restrictions – Subsistence taking of fish

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

* * *

(ix) A rod and reel; and

* * *

50 CFR §100.27(e)(9) Subsistence taking of fish. Kodiak Area

* * *

(vii) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.

(viii) You may take salmon only by gillnet, rod and reel, or seine.

* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Adopting these proposals may increase the number of fish available for federally qualified subsistence users.

Federal Position/Recommended Action: OSM supports Proposals 44 and 45.

Rationale: Prohibiting multiple hooks and bait in the sport fishery is likely to reduce release mortality of incidentally caught non-target fish. Reducing all mortality sources for stocks that have failed to steadily meet escapement goals (Ayakulik and Karluk rivers Chinook Salmon) may be warranted.

PROPOSAL 46

5 AAC 64.030. Methods, means, and general provisions – Finfish.

Allow snagging as a legal method for Sockeye Salmon in Kodiak Island freshwaters as follows:

Sockeye Salmon may be legally harvested while hooked anywhere in the body in Kodiak Island freshwaters.

Current Federal Regulations:

50 CFR §100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations.

(a) Definitions

* * *

Hook means a single shanked fishhook with a single eye constructed with one or more points with or without barbs. A hook without a “barb” means the hook is manufactured without a barb or the barb has been completely removed or compressed so that barb is in complete contact with the shaft of the hook.

* * *

Rod and reel means either a device upon which a line is stored on a fixed or revolving spool and is deployed through guides mounted on a flexible pole, or a line that is attached to a pole. In either case, bait or an artificial fly or lure is used as terminal tackle. This definition does not include the use of rod and reel gear for snagging.

* * *

Snagging means hooking or attempting to hook a fish elsewhere than in the mouth.

* * *

50 CFR §100.27 Subsistence taking of fish.

* * *

(b) Methods, means, and general restrictions – Subsistence taking of fish

(1) Unless otherwise specified in this section or under terms of a required subsistence fishing permit (as may be modified by regulations in this section), you may use the following legal types of gear for subsistence fishing:

* * *

(xix) A rod and reel; and

* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Unknown

Federal Position/Recommended Action: OSM is neutral Proposal 46.

Rationale: Allowing the retention of foul hooked Sockeye Salmon is likely to decrease incidental mortality from the requirement to release fish hooked in areas other than the mouth. If this proposal is adopted, non-target species could be impacted or mortally wounded. Snagging currently is not allowed in the Kodiak Area under Federal subsistence fishing regulation. If this proposal were adopted, a similar proposal would likely be submitted during the subsequent Federal fisheries regulatory cycle.

If the Board of Fisheries chooses to authorize snagging in freshwaters of Kodiak Island, OSM recommends prohibiting snagging in waterbodies when stocks are not meeting their escapement objectives.

PROPOSAL 49

5 AAC 64.060. Kodiak Area Salt Water King Salmon Sport Fishery Management Plan.

Modify the Kodiak Area Salt Water King Salmon Sport Fishery Management Plan as follows:

(4) the bag and possession limit for king salmon is two fish, with no size limit **except for May 15-July 31 when bag and possession limit for king salmon is one fish, with no size limit;**

(5) **For summer fisheries (April 1-August 31): 20 inches or longer: There is a combined annual catch limit of 5 King salmon 20 inches or longer. A king salmon of 20 inches or longer that is removed from salt water must be retained and becomes a part of the bag limit for of the person who originally hooked the fish. You must not remove a King salmon of 20 inches or longer from the water before releasing it.**

Current Federal Regulations:

50 CFR §100.27(e)(9) Subsistence taking of fish. Kodiak Area

* * *

(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(A) In the Federal public waters of Kodiak Island, east of the line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within 1 mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Adopting this proposal may increase the number of Chinook Salmon available for escapement and for harvest by federally qualified subsistence users in Federal marine waters in the Kodiak Area.

Federal Position/Recommended Action: OSM supports Proposal 49.

Rationale: Lowering the Chinook Salmon sport limit in the Kodiak Area salt waters may result in more Chinook Salmon available for escapement and for harvest by federally qualified subsistence users. Although stock compositions of the Chinook Salmon harvested in the Kodiak Area marine sport fisheries indicate the majority of salmon harvested are not bound for Kodiak watersheds, the recent status of the Chinook Salmon stocks are not considered strong or healthy. Actions to reduce mortality on Chinook Salmon is currently warranted during this time of statewide low abundance.

PROPOSAL 51

5 AAC 64.XXX. New Section.

Prohibit commercial transporters from sport or subsistence shellfish fishing while transporting clients as follows: No commercial transport vessel may conduct saltwater sportfishing or subsistence crab fishing while in the act of transporting nature viewers or hunters on Kodiak Island or its near shore waters.

Current Federal Regulations:

50 CFR §100.3 Applicability and Scope.

* * *

(b) The regulations contained in this part apply on all public lands, including all inland waters, both navigable and non-navigable, within and adjacent to the exterior boundaries of the following areas, and on the marine waters as identified in the following areas:

(1) Alaska Maritime National Wildlife Refuge, including the:

(i) Karluk Subunit: All of the submerged land and water of the Pacific Ocean (Sheliokof Strait) extending 3,000 feet from the shoreline between a point on the spit at the meander corner common to Sections 35 and 36 of Township 30 South, Range 33 West, and a point approximately 1 1/4 miles east of Rocky Point within Section 14 of Township 29 South, Range 31, West, Seward Meridian as described in Public Land Order 128, dated June 19, 1943;

(ii) Womens Bay Subunit: Womens Bay, Gibson Cove, portions of St. Paul Harbor and Chiniak Bay: All of the submerged land and water as described in Public Land Order 1182, dated July 7, 1955 (U.S. Survey 21539);

(iii) Afognak Island Subunit: All submerged lands and waters of the Pacific Ocean lying within 3 miles of the shoreline as described in Proclamation No. 39, dated December 24, 1892;

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Adopting this proposal would not affect federally qualified subsistence users' ability to participate in the Federal subsistence fisheries of the Kodiak Management Area and would limit non-federally qualified users' take of fish and shellfish from Federal public waters.

Federal Position/Recommended Action: OSM supports Proposal 51.

Rationale: Adopting this proposal may result in more fish and shellfish resources available for federally qualified subsistence users fishing in Federal public waters. Many of the shellfish resources in waters under federal subsistence fisheries jurisdiction are severely depressed, substantially restricted, or closed to take by non-federally qualified users.

PROPOSAL 58

5 AAC 01.525. Waters closed to subsistence fishing.

Establish waters closed to subsistence fishing for salmon outside the mouths of Danger and Cold creeks as follows:

From a marker at 58 degrees 12.4 minutes North to the eastern island and from a marker at approximately 58 degrees 34.4 minutes North to the western island.

Current Federal Regulations:

50 CFR §100.3 Applicability and Scope.

* * *

(b) The regulations contained in this part apply on all public lands, including all inland waters, both navigable and non-navigable, within and adjacent to the exterior boundaries of the following areas, and on the marine waters as identified in the following areas:

(1) Alaska Maritime National Wildlife Refuge, including the:

(i) Karluk Subunit: All of the submerged land and water of the Pacific Ocean (Sheliokof Strait) extending 3,000 feet from the shoreline between a point on the spit at the meander corner common to Sections 35 and 36 of Township 30 South, Range 33 West, and a point approximately 1/4 miles east of Rocky Point within Section 14 of Township 29 South, Range 31, West, Seward Meridian as described in Public Land Order 128, dated June 19, 1943;

(ii) Womens Bay Subunit: Womens Bay, Gibson Cove, portions of St. Paul Harbor and Chiniak Bay: All of the submerged land and water as described in Public Land Order 1182, dated July 7, 1955 (U.S. Survey 21539);

(iii) Afognak Island Subunit: All submerged lands and waters of the Pacific Ocean lying within 3 miles of the shoreline as described in Proclamation No. 39, dated December 24, 1892;

* * *

50 CFR §100.27(e)(9) Subsistence taking of fish. Kodiak Area

* * *

(v) The annual limit for a subsistence salmon fishing permit holder is as follows:

(A) In the Federal public waters of Kodiak Island, east of the line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within 1 mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraph (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

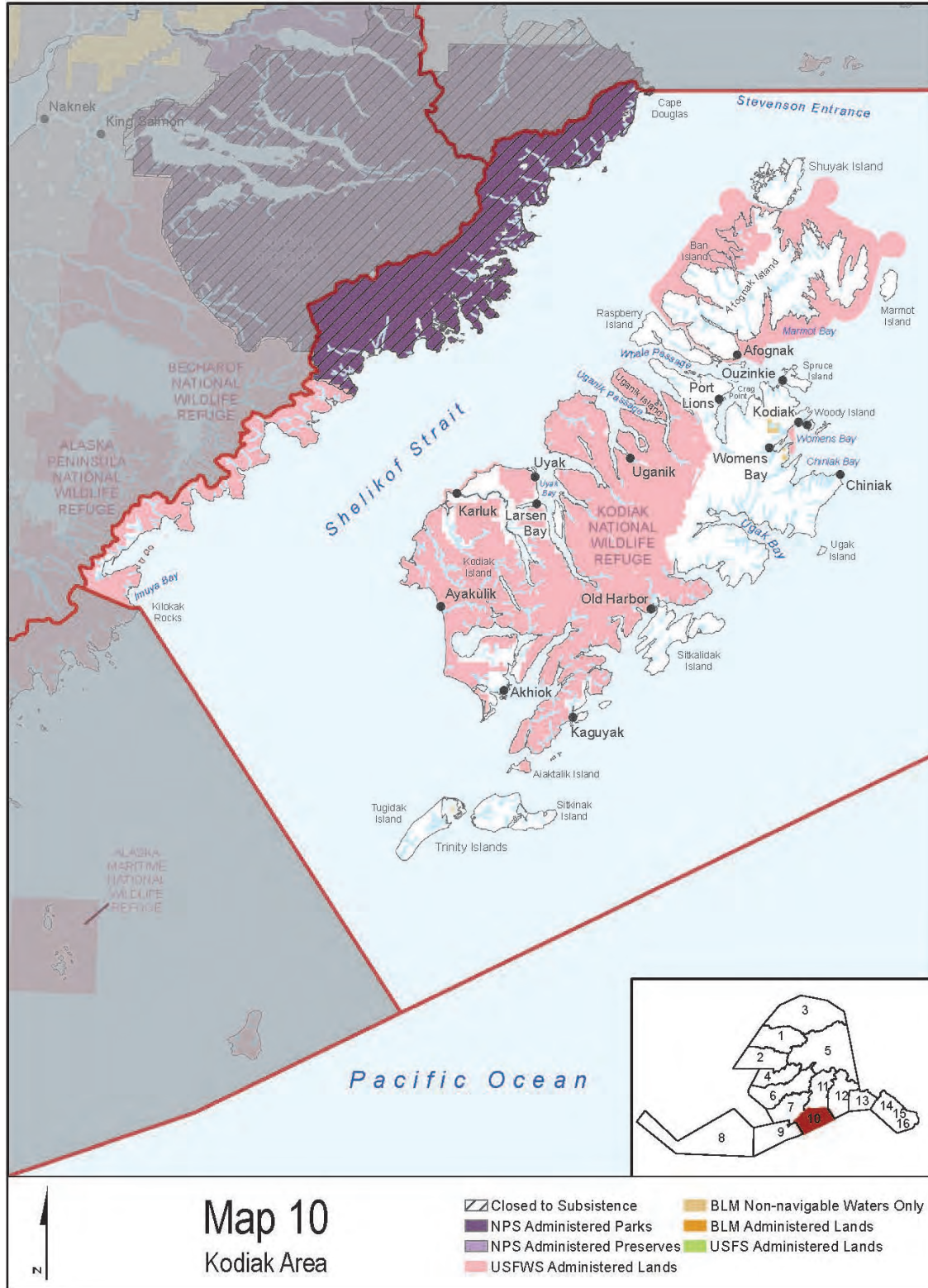
* * *

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/fish: Residents of the Kodiak Island Borough, except those residing on the Kodiak Coast Guard Base, have a customary and traditional use determination for salmon in this area. This proposal would exclude non-federally qualified users from fishing in this area but would not apply to Federal fisheries occurring in the same area (see attached map). Adopting the proposal may increase the number of fish available to federally qualified subsistence users fishing under Federal regulation in this location.

Federal Position/Recommended Action: OSM is neutral on Proposal 58.

Rationale: Adopting this proposal would provide a preference for federally qualified subsistence users to harvest salmon in this location. However, OSM is unsure if there is a substantial enough conservation concern to warrant a closure.



Map 1. Kodiak Area including the Federal marine waters of Womens Bay, Karluk, and Afognak subunits.

Dan Ogg
[REDACTED]
Kodiak, Alaska [REDACTED]

Dear Board of Fish Members,

My name is Dan Ogg. My wife, Susan Jeffrey, and I each own a Kodiak Island salmon set net permit and we run our family set net fish camp. We have lived in Kodiak for half a century. Our Family has fished salmon since 1987. 2024 will be our 38th year. Our fish camp is in the Central Section of the North West District of the Kodiak Salmon Management Area.

The Central Section is the only section managed for and fished by the seine fleet and the set net fleet simultaneously. In addition, the small Alitak District is an exclusive set net district located 80 miles to the south of the Central Section. Except for these two sections the remainder of the Kodiak Salmon Management Area is exclusively for the seine fleet. The Kodiak Salmon Management Area is 13% larger than the state of Massachusetts.

The Central Section is currently 100% allocated on a catch as catch can basis. Therefore, any proposal that changes the Time, Area or Gear in favor of one gear type will decrease the catch as catch can traditional share of the other gear type.

Setnetters in the Central Section of the Northwest Kodiak District have been losing their Traditional harvest percentage to the point where the fishery is in danger of not being viable anymore.

- 1. I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Setnetters Association. These proposals aim to reverse that trend.**
- 2. I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the set net fleet.**

Thank you for your consideration.

Sincerely,

Dan Ogg



PC121

Submitted by: Maria Painter

Community of Residence: Kodiak

Comment:

I am opposed to proposal 57

The Kodiak Food and Bait Herring Fishery has been Limited Entry for over 20 years and I think it should stay that way.

Proposal 57: Oppose



PC122

Submitted by: Ron Painter

Community of Residence: Kodiak, AK

Comment:

I am opposed to Proposal 57. I don't want to see the rights of existing stakeholders in the fisheries be diminished by others that have sold their rights to participate in the fishery.

Proposal 57: Oppose



PC123

Submitted by: Marko Patitucci

Community of Residence: Kodiak Alaska

Comment:

I'm oppose proposals 62. I am a second generation commercial fisherman. I believe taking away time from the seine fleet for the set net fleet is wrong . Also it will not benefit the salmon run, it will only be detrimental to the salmon run. Robbing another fishery for your gain is the not right way. Please do not pass this proposal. I depend on the few each hour and day so much as it is. It is already so hard to have a decent season as it is. This is not good for the kodiak community as a whole. This is not good for for fishing family's as a whole. Thank you.

I support proposal 56, please make it possible for the fall herring fishery to be open to the sac roe herring permits. It is not right that a fishery is only open to a a few permits. It has been monopolized by one family because of this. Sam Much said in his own words that there is no money in the fishery. If that the case why not give other chances to fisherman to make new markets and opportunities. 20 years from now I don't want to look back and see nothing has changed. This is an amazing natural resource they should not be only for a select few.

With the fishing industry so volatile we need more opportunities to have a chance to not thrive but survive. We are just looking wanting a chance to participate in this natural resource.

I support proposal 66, eliminating the 50 fathoms of lead web so we could have full body web. Eliminating lead web will not increase our catch rate at all, however it will help us save money. Every few years many seiners replace their body web however the lead web does not get replaced, it is not as important but when you do have to replace it it is close to \$4k. If we were aloud to have all body web then we could reuse our body old web instead of buying new leads. This would be very beneficial to new young fishermen. There are pallets of free older body web all around town that would work great for that section of the net. This is a gear enhancement not a catch enhancement. Also means les web goes to the landfill.

Proposal 57: Support

Proposal 62: Oppose

Proposal 63: Oppose

Proposal 64: Oppose

Proposal 65: Oppose

Proposal 66: Support

Proposal 67: Oppose

Proposal 68: Oppose

Proposal 69: Oppose

Proposal 70: Oppose



PC124

Submitted by: Michael Patitucci

Community of Residence: Kodiak

Comment:

I have been saining in Kodiak for 47 years. I support proposal 57, I have always wanted to get into the fall herring food/bait fishery, however I have found it to be impossible to buy into the fishery. From what I have found all the seine permits are owned by one family but one. When I asked to buy that one permit I was told that he had to sell it to the family that owned the rest. This natural resource has been monopolized for too long. If this continues it is a shame and a bad example how we manage our precious fisheries. Opening it up to the sac roe permits will give opportunities to many fishermen and crew to build something special. I support 66. eliminating lead web. It is a gear advancement not a catch advancement. It well help my operation be more affordable to operate on these narrow margins because I have a lot more 3 and a half inch web laying around.

Proposal 57: Support

Proposal 63: Oppose

Proposal 64: Oppose

Proposal 65: Oppose

Proposal 66: Support

I am opposing proposal 62, I have been salmon saining in Kodiak Island for 47 years. Owner operator of the F/V Morning Star, long time Kodiak resident and this proposal will be detrimental to my operation. The 57 hours which are hardly enough hours as it is pay for fuel, insurance, food. Why are we getting penalized for the lack of effort the gillnetters show on the west side. The lack participation on major producing set net sites all over the the west side have been abandon. Why are we getting punished for there lack of effort. This proposal would be extremally bad economically for the Kodiak community.

Proposal 62: Oppose



Submitted by: Susan Payne

Community of Residence: Kodiak

Comment:

Dear Members of the Board of Fisheries,

As a set gillnet permit holder in Viekoda Bay, Kodiak Island Management Area, Central Section, I write to support the NW Setnet proposals which seek a solution to a diminishing share of the Westside salmon catch. The NW Setnet group met for a year in an attempt to draft proposals that would help our sector without impacting current fishing for the other groups.

There has been a reallocation over the years and these proposals work to reverse that trend.

Proposal 70 is the goal towards equity. Proposals 64, 62, and 69 are the possible tools that management could utilize to achieve the goal.

Proposal 71 is important because it eliminates the mandate for management to open the Outer Karluk section. Often, the Central Section, the only section the NW setnetters are allowed to fish, are held back from fishing in order to meet the "midpoint of the Karluk escapement range" only to have the Outer Karluk section open to seiners. All "shall" mandates throughout the Kodiak Management Plan should be changed to "may" in order to give management greater control over escapement and catch.

Proposal 64 allows the setnet fleet a tool to catch fish during the slime events.

I oppose Proposals 66, 72, 73 and 74 which would further impact the fish reaching the Central Section and the setnet area. Proposal 74 is disturbing because it is described to you as a conservation measure. ADFG Management already has the tools they need in the NW District to conserve specific bay returns. They can differentially close individual inner bays and alternatively close the entire Central Section while keeping inner bays open. This is why the Kodiak Management Plan was designed as it is.

I very much OPPOSE Permit Stacking, Proposal 63 !!! This does not solve the diminishing share/return to the setnet fleet. This proposal is an opportunistic move to benefit existing setnetters at the detriment of future entrants into the fishery. There was no mention of this proposal at NW Setnet meetings that I attended and the Board should not see this as a common goal of that group. We successfully defeated permit stacking in Kodiak previously. If by some chance you approve this proposal please put limits on the number of sets/amount of net one person can have, similar to the use of D permits in Bristol Bay.

We have fished our site since 2002 with our family. In that time, we have seen a dramatic decrease in our catches. We do not hire crew anymore because it is sad asking crew to work for an entire summer for a wage less than what they could make at McDonalds. Help us draft a workable plan.

Respectfully,

Susan Payne

PO Box [REDACTED]

Kodiak, AK [REDACTED]

Proposal 62: Support
Proposal 67: Support
Proposal 71: Support

Proposal 63: Oppose
Proposal 68: Support
Proposal 72: Oppose

Proposal 64: Support
Proposal 69: Support
Proposal 73: Oppose

Proposal 66: Oppose
Proposal 70: Support
Proposal 74: Oppose



Submitted by: Eduardo Perez

Community of Residence: Kodiak alaska

Comment:

Proposal 53- i am a small boat operation put of kodiak that participates in the pot cod fishery if this proposal passes to allow the use of slinky pots there needs to be a limited entry based on fishing history or we will have a huge amount of new participants for example the small boat longline fleet. The more boats the less fishing time and money

Proposal 53: Support With Amendments

December 23, 2023

Board of Fisheries Comments

Proposal 63- *Oppose* – Allow permit stacking in the Kodiak set gillnet salmon fishery

Proposal 64 – *Support* – Modify set gillnet operations to increase the allowable size of the hook

Proposal 54 – *Oppose* – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

Proposal 55 – *Support* – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

Proposal 57 – *Support* – Modify herring purse seine gear, fishing season and periods, and herring sac roe harvest strategy to increase commercial harvest

To Chairman Wood and members of the Board of Fisheries,

My name is Theresa Peterson and my family and I have lived and fished out of Kodiak for over 35 years. We own a 42' fishing vessel with our son who runs the boat for salmon seining. In addition, we own and operate a salmon gillnet site with two permits in the South end district of Kodiak Island

Proposal 63- *Oppose* – Allow permit stacking in the Kodiak set gillnet salmon fishery

I acquired my limited entry permit in 2011, after the ability to own and operate two setnet permits sunsetted in 2010 in response community concerns. The opportunity for me to buy in came as a result of the sunset provision. The person who owned the Kodiak setnet permit and had stacked it in a family members name while pursuing fishing opportunity in Bristol Bay had to divest.

Many people would clearly benefit from the opportunity to extract income from one salmon region while fishing in another as permit stacking allows. Others seek to protect assets and would like the flexibility and convenience to own and operate two permits when fish site dynamics change such as family members moving on to other professions. Others would like to expand their operations beyond the limitations of one

permit per person. That aspect is rarely mentioned in public testimony but could certainly be an outcome of permit stacking.

It is critical that the Board clearly recognizes the implications of permit stacking, including the negative impacts of consolidation in a fishery with no demonstrated need. I understand the economic stress participants in the salmon fishery are under but this action is not the solution. The short-term gains do not warrant restructuring the Kodiak setnet fishery.

There is not an excess of latent permits or a study quantifying a measurable need. If this fishery is consolidated in response to current participants interests without an optimum permit study, nor any other criteria provided in the rationale for the legislation action which allowed for permit stacking, where does it end? Is the Kodiak seine fishery next as proposed a few cycles ago? Or the Kodiak Tanner crab fishery which is doing well? Both of these fisheries have quite a few latent permits.

We believe the limited entry system to be an ideal model to manage fisheries in promoting active participation through owner on board requirements. The permit system represents the backbone of a fisheries management policy which supports coastal communities found throughout Alaska. The system provides sufficient entry level opportunity, protected by the State of Alaska Constitution, in providing the maximum number of permits determined appropriate for each limited fishery. It is a system that has proven to work well and thorough review should be conducted for each fishery prior to implementing a significant change in the fishery.

Proposal 63, the ability to own and operate 2 setnet permits represents a significant change in the fishery and should not be considered further without an optimum permit study. Prior to allowing permit stacking in the Kodiak Island set net fishery there is a need to establish policy guidelines to determine social, economic and conservation goals of the action.

The legislative action, HB251, which allowed for permit stacking in the Bristol Bay drift net fishery, was brought forth during years of economic distress due to low salmon prices and geared to consolidate a large number of unused permits.

The legislative language stating the intent of allowing the board of fish to stack permits cites the following:

Reduce the amount of gear in the water and therefore reduce competition, consolidate the fishery, reduce the number of latent permits, avoid permit buybacks, avoid surges of

latent permits coming back into the fishery – none of these issues exist in the Kodiak setnet fishery.

In Bristol Bay the objective was to remove latent permits from the fishery using the funds of its participants. To provide incentive to purchase an additional permit, Board of Fisheries action adopted a regulation that allowed two individual permit holders to fish on the same vessel and their combined operation was allowed to fish an extra 50 fathom of net. This action was adopted with clear objectives and determined as necessary in the Bristol Bay fishery after an optimum permit study was conducted. No such objectives or optimum permit study exist for the Kodiak setnet fishery.

We encourage Board of Fisheries members to read the [CFEC report on Kodiak setnet permit stacking](#) to better understand the background of this controversial action. Please take note of Table 6 and the incremental increase of stacking in the 3 years it was allowed and Table 7 and the corresponding decline of new entrants during this same period. This data establishes a clear trend of what we would expect to see continue.

The interest to allow permit stacking in the Kodiak setnet fishery has come before the board three times now and supporters cited the need to stack permits to stay viable. In this context it is important to consider RC 2 and ADF&G staff comments found on page 75: *In the time since the permit stacking regulation sunset, the number of set gillnet permits with records of deliveries has remained relatively constant (Table 63-1) and the average exvessel value per set gillnet permit has also remained relatively constant although no adjustment has been made for inflation.*

I recognize that these are challenging times for the salmon fisheries throughout the state, however, permit stacking in a fishery with no demonstrated need is not the fix. As the board considers a suite of controversial proposals, permit stacking in the setnet fishery should not be used as a negotiation tool among salmon gear types.

Please consider the following points against proposal 63:

- A 50% potential ownership reduction represents a significant shift in the fully utilized setnet fishery. Without a thorough analysis and clear policy direction, this action is nothing more than a convenience.
- There is **no observed excess of harvesting capacity** in this fishery.
- The State, through CFEC regulations, **demand**s active participation of permit holders and prohibits absenteeism, but makes allowances for these in cases of hardship through emergency transfers.

- When consolidating a fishery, we must take into consideration the requirements of Alaska’s constitution. Particularly Article VIII Section 15: ***“A limited entry system should impinge as little as possible on the open fishery clauses consistent with the constitutional purposes of Limited Entry”.***
- Dual permits disadvantage the single permit holder and will put pressure on the single permit holder to acquire another to stay ‘whole’.
- Dual permits may enable Kodiak setnet participants to engage in other salmon fisheries and other occupations. This circumvents the current regulation which states that salmon permit holders may only participate in one salmon fishery as a permit holder in any given year.
- The proposal primarily benefits those who currently hold limited entry permits and will **consolidate ownership** of the limited entry permits, thereby **reducing future opportunity for others**.
- Permit stacking will exacerbate the challenges found in small rural communities around Kodiak to acquire limited entry permits.

It is a privilege to participate in the limited entry fisheries in Alaska and there is a balance to provide economic opportunity for those engaged in the fishery while providing opportunity for those who want a chance to put their boots on and go fishing. Before disrupting a functioning fishery, which allows for maximum participation, conduct the studies to illustrate why the action is needed.

The Kodiak setnet fisheries play a crucial role in the economy of Alaska. Entry-level opportunities in the salmon setnet fisheries help support the vitality of coastal and rural communities in the Kodiak Island Archipelago. By providing jobs and economic activity, these opportunities contribute to the overall well-being of these communities.

Opportunities in the Kodiak setnet fishery are important for the economic, social, cultural fabric of the region. They provide avenues for employment, skill development, and cultural preservation while contributing to the sustainability of the fishery and the well-being of local communities.

These relationships are well understood and numerous studies document the value of maintaining opportunity to access fisheries to support fishing communities. Please see below for more information:

- A 2017 press release highlights the report “[Turning the Tide](#)” which offers solutions to Alaska’s “graying of the fleet” problem and loss of access by rural communities to the state's fishing industry.
- News can be found in the 2016 stories “[Aging workforce poses challenge to Alaska fishing’s future](#)”

Proposal 64 – Support – Modify set gillnet operations to increase the allowable size of the hook

This proposal is intended to provide additional harvest opportunity in struggling setnet fisheries by increasing efficiencies in the gear. It is an incremental shift that may increase harvest in a sector that has been experiencing a decline in historical harvest percentages. It may benefit current participants as well as new participants without impacting other user groups or new entrants.

Proposal 54 – Oppose – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

The current spring rollover regulation was adopted by the board during the last cycle in January 2020 and is working as intended. Proposal 54 seeks to establish an allocative threshold that will result in jig rollover to the pot sector most years as demonstrated. This outcome is shown in data presented in RC2, ADF&G staff comments, on pages 40 and 41, tables 54-1 and 54-2, which show the rollover will be triggered in years that the jig fleet successfully harvested their GHL allocation. The proposal is a fish grab from an important entry level opportunity fishery. Pot vessels have the opportunity to enter the slower paced jig fishery after the fast paced pot fishery closes.

Proposal 55 – Support – Amend state-waters Pacific cod guideline harvest rollover criteria for pot and jig gear

Proposal 55 was submitted by the Alaska Jig Association and is intended to further strengthen the rollover provisions with a percentage threshold triggered on March 25th.

Entry level opportunities allow individuals, particularly those from local communities, to gain experience and contribute to the economic growth of the region. The jig fishery serves as a gateway for individuals to enter the commercial fishing industry. The fishery role provides valuable training and hands on experience in fishing techniques, gear handling, safety protocol and industry specific knowledge.

The jig fishermen have worked in good faith to provide rollover opportunity earlier in the season when the conditions are not favorable to harvest the GHL for the jig sector. In an attempt to address management concerns with ambiguity in determining factors to rollover the quota the fleet is willing to apply a reasonable threshold to trigger the rollover. In addition, the jig fleet recognizes the wording may in the proposal would benefit from additional clarity and is supportive in changing 'may' to 'shall' where deemed appropriate.

Proposal 57 – Support – Modify herring purse seine gear, fishing season and periods, and herring sac roe harvest strategy to increase commercial harvest

Herring is a valuable resource to the marine ecosystem and it managed under conservative harvest amounts. Use of herring as a food product should be encouraged in management, particularly when new markets open up. In addition, local bait can be of great value to community-based fishermen, both for their own use and entrepreneurial opportunities to market bait to other fishermen. The proposal seeks to increase opportunity for those interested in pursuing and developing markets while not taking away from the few existing food and bait permit holders. There could be opportunity for the underutilized gillnet permits to develop markets in the food and bait fishery to make it once again a viable option in a diversified fishing portfolio.

Thank you for your careful consideration of this issue and we look forward to discussing the matter further during your visit to Kodiak.

Sincerely,

Theresa Peterson



Submitted by: Jane Petrich

Community of Residence: KODIAK. ALASKA

Comment:

December 26, 2024

Dear Board of Fish Members,

Hello! My name is Jane Petrich and I have made my home in Kodiak and Larsen Bay (village on the west side of Kodiak Island) since 1971. I have been a set net permit holder and fished the west side of the Island since 1978. My three (now adult) children spent every summer of their lives into adulthood in the Kodiak set net fishery. My daughters in law and oldest granddaughter hold set net permits and all 3 of my grandchildren spend their summers at our fish site. Set netting has been a corner stone of my family's life for 45 years but that has changed in recent years due to the decline in profitability in the setnet fishery. Last season only one of my sons fished our sites and with all the uncertainty in the fishery and our declining catches we may not be able to afford to fish in coming seasons.

We need your help to save this historic fishery. I hope you are listening.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association and proposals 63 and 69, submitted by individual permit holders. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

Proposal 62 attempts to give the set net fleet more time in the water without the presence of the increasingly efficient seine fleet.

Proposal 64 is a change to how we configure our gear with no increase in fathoms fished.

Proposal 70 provides allocative per centages that would return the set net fleet to historic catch levels. Management would have the flexibility to implement strategies to achieve this percentage.

Proposal 71 is a wording change (shall to may) in regulation that shifts some of the burden of conservation off the shoulders of the set net fleet.

Proposal 63 allows one person to hold and fish two set net permits. This is simply a tool most needed by family operations to more smoothly manage multiple permits. This is primarily opposed on a philosophical level by people who feel it will restrict new participants entry into the set net fishery. This is one minor administrative change that could keep family operations in business. Shouldn't I have as much right to pass a permit on to me grandchildren as to provide a permit to newcomer into the fishery?

Proposal 69 is another proposal for giving the set net fleet an opportunity to fish without competition from the increasingly efficient seine fleet.

I am opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Proposals 72 and 73 chip away at the fish passing through areas bordering the only area open to the set net fleet and could reduce numbers of fish reaching Karluk – resulting in lower escapement levels and shutting down fishing in the Central District.

Proposal 74 is particularly egregious. It is packaged as a conservation measure and puts the burden of conservation on the shoulders of the set net fleet. It divides the set net fleet, closing Bays in which they are established and requiring them to stop fishing. Seiners would simply move to the next Bay over and continue fishing. Setnetters in the closed Bay cannot move and would lose fishing opportunity. This would also concentrate seiners on top of Setnetters in open area and further reduce Setnetters opportunity.

Again, I hope you are listening! I have heard multiple times during my preparation for the upcoming BOF meetings that Seiners and Setnetters should be meeting to work out their differences. Society does not expect divorcing couples to resolve conflicts or feuding property owners to equitably divide property without mediation. Fishery user groups should not be expected to resolve their conflicts. It is the responsibility of the members of the Board of Fisheries as stated in Alaska Statute.

“The Board of Fisheries (BOF) is responsible for considering and adopting regulations to allocate resources between user groups; ... AS 16.05.251

Thank you for your consideration.

Sincerely,

Jane Petrich

Proposal 62: Support

Proposal 63: Support

Proposal 64: Support

Proposal 66: Oppose

Proposal 69: Support

Proposal 70: Support

Proposal 71: Support

Proposal 72: Oppose

Proposal 73: Oppose

Proposal 74: Oppose

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing to with respect to **proposal 63**. Because this proposal deals exclusively with the setnet fishery without imposing any operational restrictions on the seine fleet I am **neutral** on this proposal. However, in addition to the socio-economic impacts within the setnet fleet, I would like the board to acknowledge and understand that passage of this proposal *will* result in higher utilization of available setnet permits and will raise the aggregate harvest for their gear type, therefore there are allocative implications that should be considered with this proposal. Again, I have no opposition to this approach to improving their fishery, and I fundamentally support the setnet fleet pursuing solutions that do not impose restrictions on other user groups.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in regards to **Proposal 64**. I am neutral on this proposal and generally support setnet fishermen pursuing improvements to their fishery without imposing restrictions on other user groups. I would, however, like the board to acknowledge and explore that improving the harvest effectiveness of the setnet gear type has both conservation and allocative impacts and would ask the board to consider the totality of those impacts for both near and long-term considerations.

Darren Platt

FV Agnes Sabine

Kodiak, AK

I am writing in **opposition to proposal 61** which sets an unrealistic minimum escapement threshold for coho long before the peak of the run and would prefer the harvest of pink salmon returning to this system. The department already manages responsibly for coho escapement based on scientific standards and their policies shouldn't be overrun by the arbitrary and capricious imposition of minimum escapement thresholds that don't even correlate with the run timing of the species they are designed to protect.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **opposition to proposals 67 and 68**. While I consider it important for the board to address escapement goals for critical salmon systems, it is imperative that these goals have a sound scientific basis and account for the needs of all user groups. The Ayakulik and Karluk are already managed very conservatively for coho, and these arbitrary escapement thresholds would be imposed long before most of these fish show up, essentially preventing the Department from balancing management needs for other species. The Karluk would especially be imperiled by proposal 68, as the seine fleet would be deprived of substantial harvest opportunity and this system would suffer from chronic over escapement which would assuredly collapse the sockeye fishery. Please oppose these proposals.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing to **oppose proposal 65**, which, if implemented would prohibit the use of aircraft to locate salmon for the purpose of commercial harvest. This proposal is problematic in its assumptions, proposed implementation, and in the inevitable unintended consequences.

First and foremost, this rule has proven to be entirely unenforceable elsewhere in the state. There are no statutes forbidding private airplanes from flying over salmon systems and observing fish and no laws forbidding pilots and passengers of these planes from discussing their observations with members of the public. It would be impossible for the Alaska State Troopers to prove or determine the intentions of all bush pilots in the Kodiak area, or to regulate any contracts privately made between pilots and fishermen. The adoption of this regulation would inevitably result fishermen and pilots utilizing loopholes that evade the intention of the rule, giving an even greater advantage to those operators who do not wish to follow the spirit of the regulation.

The Kodiak Management Area is a large regulatory region with hundreds of salmon streams that are remotely located and chronically underutilized due the costs and difficulties of traveling long distances to find fish. The use of pilots in Kodiak doesn't imperil our salmon populations – it simply allows fishermen to harvest surplus fish that wouldn't otherwise be caught and prevents those fishermen from traveling to and operating in areas of low abundance, therefore contributing to the conservation of stocks.

The assertion that “the use of aircraft to locate salmon benefits a small portion of the Kodiak salmon fleet and diminishes opportunity for other members of the fleet” is generally untrue. Every seiner in Kodiak has the right to hire a pilot, if they so desire, so it is not a privilege granted to a select few. Additionally, pilots are typically used to find fish in areas where other fishermen aren't operating, so their implementation eases competitive pressure and reduces focused fishing effort, therefore benefitting everyone engaged in the fishery. It is generally desirable to spread out the fleet in this way to maximize yield and reduce focused fishing effort. In fact, the fishermen who employ pilots are typically the most skilled and productive in the fleet, and so the use of pilots to displace these fishermen to otherwise unfished areas results in a substantial positive impact on the harvest volumes of less competitive operators.

Among the most impactful of the unintended consequences of this proposal would be that it would erode the department's ability to manage the fishery for escapement. Only a handful of salmon systems in Kodiak are equipped with weirs, and so aerial surveys of river systems to gauge escapement is

the *only* means local managers have to determine run strength and manage the fishery. Recent budget shortfalls have resulted in early removal of weirs and fewer aerial surveys. Privately hired pilots in recent years have been able to make up for much of the budget deficiencies by allowing area biologists to join their flights in order to survey escapement conditions, thereby benefitting *all* of Kodiak's fishermen. Without these flights, the department would lack the necessary data to properly manage the fishery. Fishing opportunity has already been regularly curtailed due to lack of aerial survey data, and so fishermen could expect fewer harvest opportunities if proposal 65 were adopted.

Finally, Kodiak's salmon fleet is the economic engine of this community as shoreside businesses rely on income from fishermen. The net impact from implementation of this proposal would be an economic loss for Kodiak beyond just the reduced harvests for our fishermen – it would put more townsfolk, especially the pilots themselves and their employees, out of business. I ask the board to please consider the totality of impacts that would result from the implementation of proposal 65 and reject this proposal.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **opposition to proposal 69** as written. While I appreciate the intention of the proposer in trying to provide fishing opportunity for setnet fishermen without imposing any restrictions on the seine fleet, this proposal doesn't properly account for the conservation needs of the Northwest district. While the proposer suggests that the department may curtail the mandatory openings when there is a conservation concern, this would be tantamount to asking the department to make subjective in-season allocative decisions. The department cannot simply select a single gear type to restrict for conservation purposes without explicit guidance that is not provided in the proposal. The West Side is best managed with openings and closures to both gear types simultaneously to allow for the safe passage of fish when needed, fairly distribute the burden of conservation, and assure that conservation decisions aren't strictly allocative.

Darren Platt
FV Agnes Sabine
Kodiak, AK
12/26/2023

John Wood
Chairman
Alaska Board of Fisheries
Street Address
City, ST ZIP Code

I am writing in **support of proposal 57** which would change the harvest dates for G01K and G34K herring permits. The adoption of this proposal would correct the shortsighted error of forcing fishermen and processors to utilize herring during a short time-frame in order to maximize the production of single product type. The current regulatory structure prevents the state from obtaining the full economic potential of this fishery and has resulted in the wasteful overproduction of sac-roe products and more recently, the underutilization of an abundant resource.

The board should be aware that this proposal does *not* allocate more fish to G01K and G34K permit holders, instead, it grants them more *time* to harvest their already extent allocation in order to optimize utilization according to actual market and product demands. Currently, this fishery season is temporally managed according to the most arbitrary reference point of any fishery in the state – herring quotas are required to be harvested to maximize the production of a product type dedicated to feed the market of a single foreign nation 35 years ago. This is an irrational bench mark to base a modern fishery management plan and proposal 57 provides the board with a remedy to correct this oversight from decades ago.

Arguments that this management change would intrude on the historical access rights of the single vessel currently operating under an H1DK permit are unfounded. The allocation granted to the individual controlling all of the H1DK permits would go unaffected, and he would be allowed access to the same biomass and quota available under the current regulatory protocol. In fact, transferring portions of the G01K/G34K quota to the fall period would provide more biomass for the single H1DK operator by limiting herring harvest in the spring. The primary concern however, isn't actually for the competition for access to fish, it is instead for market competition of the finished product. It would be an unprecedented action for the board to make a decision in order to protect a user group from such market competition. There is no regulation, policy or statute that requires or even authorizes the Alaska Board of Fisheries to protect the market share of a processed product type for any user group. In fact, any such action taken by the board that is designed to hinder the execution of a competitive and efficient market for our

fishery products would necessarily inhibit the use of the resource to the maximum benefit of the people without any conservation benefits either economic, ecological or otherwise. The Alaska Board of Fisheries is not intended to regulate the processing of fish beyond providing harvesters a regulatory structure that ensures processors are afforded the greatest capacity to maximize the value of the resource.

Kodiak in particular is the optimal location to begin the transition out of the current antiquated regulatory herring structure. 20% exploitation rates of herring biomass are accepted to be a sufficiently conservative level of exploitation in order to sustain the resource, and quotas in Sitka and Togiak are set at this level. Not Kodiak. Our spring herring quota is set at an ultra-conservative 10% of estimated biomass, and the fall H1DK quota is set at 1% for an aggregate 11% total exploitation, well below accepted sustainable levels. This extraordinarily large conservation buffer provides more than enough protection to assuage any concerns on how changed harvest patterns could impact the resource.

Historically the department's policy has been to require H1DK permit holders to form a combine in order to assure that the 1% allocation isn't exceeded. This makes sense since such a low quota level means that harvesters engaged in a competitive fishery could easily exceed their allocation. This requirement hasn't been re-examined in recent years as every permit has been aggregated onto a single boat, eliminating the potential for a competitive fishery. The allocation into the B-season of a minimum of 1,000 tons of quota for G01K/G34K permit holders would still allow for the department to set requirements for participating fishermen to register to an area, report all harvest immediately, form a combine or other cooperative agreement, or impose other such restrictions such as forbidding the use of tender vessels. Modern communication has eliminated many prior concerns of overexploitation, as currently G01K/G34K permit holders report *every set* they land immediately to the department so that minute-by-minute in-season management has allowed for an orderly and sustainable sac-roe fishery. If fishermen can do this in the spring, they can assuredly do it in the fall and the department would maintain the right to close the fishery due to conservation concerns even if the quota weren't caught.

Proposal 57 clearly provides a greater opportunity for Kodiak's fishermen and processors to optimize harvest timing in order to properly supply a global market that is vastly different from when the management structure was first implemented. It would also allow Kodiak's fishermen to harvest and potentially sell their own bait, as well as supply the other processors with herring that they couldn't obtain it before. The current single harvester/single processor monopolization of the fall fishery has created market inefficiencies that negatively impact Kodiak's crab, cod, halibut, and sablefish fishermen who have endured years of hyperinflated bait prices caused by monopolized control of the resource. So, in addition to allowing fishermen and processors to better explore and exploit global food herring markets,

John Wood
12/26/2023
Page 3

proposal 57 would have the added benefit of lowering operating costs for many Kodiak fishermen, a desperately needed respite from the current level of inflation.

It's time for Alaska to reimagine our herring fisheries. Let Kodiak be the new management standard for sustainability and market efficiency. Proposal 57 is the right change in order better manage and steward our herring resources.

Darren Platt

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 66** which would eliminate the requirement that our nets include a 50-fathom section of 7" leadweb. I am a bay-fisherman and spend as much time as possible in the crows nest where I am able to observe fish swimming in the net. In my 14 seasons running the boat I have only witnessed salmon swim through leadweb twice, for a grand total of about 20 fish out of millions harvested. I personally will not remove my leadweb because it is much easier to repair when torn; however, I would appreciate how it would simplify the annual net building process by not requiring that leadweb begin exactly after 200 fathoms. This change wouldn't substantially impact the harvest ability of seiners, but would improve the financial efficiency of our operations by simplifying the net building process. Given the current state of salmon markets coupled with the rapid inflation of operating costs this proposal would at least provide some improvement economics of our fishery.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 71**. I would first like to address the allocative implications of this proposal. By eliminating some of the historically applied openings of the Outer Karluk Section in concurrence with the Central Section, this proposal will result in a re-allocation of sockeye to setnet fishermen. When the department decides to close the Outer Karluk Section as provided for in this proposal, then Karluk sockeye harvest would largely be concentrated in the Central Section where setnetters catch a majority of these fish. While managing for escapement this would allow for longer central section openings in the absence of fishing opportunity at Outer Karluk, which in turn would provide more fishing time and higher harvests for setnet fishermen, and less overall harvest for seiners.

This proposal does, however, have merit based on its conservation value. The Department should have the flexibility to close the Outer Karluk section as needed in order to conserve sockeye, pink salmon, and chinook returning to the Karluk system, and this proposal provides them with better tools to conserve those stocks while providing for sufficient harvest opportunity elsewhere.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 72**. Historically the Southwest Afognak Section has opened with Central Section for pink salmon harvest opportunity. When the board amended the West Side Management plan in 2020 to include option for the Department to open the Central Section in order to provide harvest opportunity for Karluk pink salmon, they should have included this section in order sustain historical seine harvest patterns and fishing opportunities. This proposal would allow, but not require, the Department to allow concurrent fishing time in the SW Afognak Section.

Darren Platt

FV Agnes Sabine

Kodiak, AK

Chairman John Wood

Alaska Board of Fisheries

I am writing in **support of proposal 73**. There is no justification for neglecting to account for pink salmon escapement in the Sturgeon River when managing the Sturgeon Section. This is an obvious oversight given that the Sturgeon River can produce over a million pink salmon and is one of the most productive pink systems on the island. This proposal would give the Department the ability to conserve pink salmon when stocks are weak and also to provide harvest opportunity when stocks are strong. There is not another district in Kodiak for which the management plan takes no consideration of the major salmon systems within the district.

While I understand that the department has concerns for sockeye salmon, and I am sure the proposer will correct those concerns, the board should understand that peak pink salmon productivity for the Sturgeon River is in late July and Early August, over a month before the historical peak of the late Karluk sockeye run, and so effort in this area during peak humpy productivity is likely to have very limited if any impact on Karluk sockeye stocks. Later in August, however, management of the Sturgeon section should absolutely account for late-run Karluk sockeye and hopefully the proposer amends the proposal to rectify those concerns.

Darren Platt
FV Agnes Sabine
Kodiak, AK

Chairman John Wood
Alaska Board of Fisheries

I am writing in **support of proposal 74**. I understand that this proposal is unpopular amongst both gear types because of the potential to restrict harvest opportunity in areas where they may fish, and I hope the Board does consider the short-term collateral impacts from this proposal that would result from fundamentally altering the way the Northwest district is managed, however, I believe that the conservation benefits of this proposal by far outweigh the short-term concerns of the public. Ultimately, the central section is too large and is managed too aggressively to adequately conserve fish.

This proposal would allow the Department to more incisively apply openings and closures within this area in order to provide opportunity on strong stocks while protecting weaker stocks. The Department *does* have the ability to close the seine-only inner bay sections, but unfortunately, setnet harvest effort does not respond to the abundance of nearby salmon systems, and so whenever any or all of the local sockeye, pink, and chum systems are weak there is a latent baseline level of effort imposed by the setnet fleet that will be applied to those stocks inhibiting them from achieving escapement goals and hindering their current restoration to historical levels of productivity.

Consider this scenario: Spiridon, Zachar and Uyak, and Kizhuyak systems are exceptionally strong, while Uganik and Terror are not. Traditionally, the department would open the central section along with the Spiridon, Zachar, Uyak, and Kizhuyak sections while leaving the Inner Uganik and Terror Bay sections closed. If Uganik and Terror are still exhibiting poor escapement, even with the inner bays closed, then the department is left with the option of leaving the central section open in order to provide opportunity on the stronger stocks to the south and east while overharvesting Terror and Uganik fish, or closing the entire area and forsaking harvest opportunity on the stronger stocks in order achieve better escapement to in Terror and Uganik Bays. If this proposal were adopted then it would eliminate the dilemma by allowing the Department, in this scenario, to impose a potentially brief closure in the Outer Uganik Section while leaving the other sections of the Northwest District open, thereby optimization *both* conservation and harvest opportunity instead of having to choose between the two.

This proposal still allows the Department to continue to rely primarily on selective Inner Bay closures, but the gauntlet of setnets that these fish have to pass in order to reach their natal streams is still often more effort than weaker systems can or should support. In fact, Inner Bay closures often to don't provide substantial additional conservation benefits, since seiners will not focus their efforts on weak stocks when more abundant stocks are available. Adoption of the proposal would result in better conservation in the Northwest District and more salmon for everyone to harvest and is the best choice for the long-term productivity of Kodiak's salmon fishery.



December 26, 2023

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

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC Supports Board of Fisheries Decision to Withdraw Proposal 59

Chairman John Wood and Alaska Board of Fisheries Members,

The Prince William Sound Aquaculture Corporation (PWSAC) supports the Board of Fisheries decision at the Lower Cook Inlet meeting to withdraw Proposal 59 from consideration at the Kodiak Finfish meeting. After careful and thorough, processed discussion, the board recognized the problems with regulation as the proposal was drafted as well as vague and confusing proposal language.

Additionally, proposals nearly identical to Proposal 59 have been seen by the board approximately 7 times since 2003. Hatchery associations, ADF&G staff, and Board of Fish members have spent considerable time and money addressing this repeat proposal. With unsubstantiated claims, each time the board has rejected the proposal. There is no scientific research consensus that suggests these repeat proposals would help the intended stakeholders. There is ongoing field research from NOAA Alaska Fisheries Science Center and ADF&G Salmon Ocean Ecology Program that suggests marine heatwave events may have played a key role in juvenile chum salmon survival. What remains clear is that a proposal such as 59 would bring harm to fishermen's small businesses, families, sport, subsistence, and personal use programs across large regions of Alaska.

Sincerely,



Geoff Clark
General Manager/CEO

**DEVELOPING SUSTAINABLE SALMON FISHERIES
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www.pwsac.com



PC132

Submitted by: Afanasy Reutov

Community of Residence: HOMER

Comment:

Hi I'm a jigger I vote no for pot taking jigging quota

Proposal 54: Oppose Proposal 55: Support



PC133

Submitted by: Avraamy Reutov

Community of Residence: Homer, Alaska

Comment:

I'm a jigger and I don't agree with proposal 54.

Proposal 54: Oppose Proposal 55: Support



PC134

Submitted by: David Reutov

Community of Residence: Homer

Comment:

I am a long time jigger and I do not agree on sharing quota with pot boats

They already have much more quota it just not fair

Proposal 45: Oppose Proposal 55: Support



PC135

Submitted by: Evsevy Reutov

Community of Residence: Homer

Comment:

I'm a jig fisherman we need all the quota we could get

Proposal 54: Oppose Proposal 55: Support



PC136

Submitted by: Julian Reutov

Community of Residence: Homer, alaska

Comment:

I support proposal 55. I oppose on proposal 54. I go commercial jigging fishing in Kodiak and proposal 54 will really effect our jigging fleet. only start fishing around end of march due to weather. And if the 50% of the quota rolls over to the pot guys there will be nothing left for the jig fleet. A lot of us depend on this quota to support our families.

Proposal 54: Oppose

Proposal 55: Support



PC137

Submitted by: Mavrik Reutov

Community of Residence: Homer,ak

Comment:

Like keep it as is please

Proposal 54: Oppose

Proposal 55: Support



PC138

Submitted by: Timon Reutov

Community of Residence: Homer

Comment:

I vote no for 54 and yes for 55....I do not want pot boats to take the jig quota.

Proposal 54: Oppose

Proposal 55: Support



PC139

Submitted by: Andrey Reutov

Community of Residence: Homer AK

Comment:

Hi all, been fishing jig and long line cod for 12+ years, and i strongly oppose proposal 54 cause i believe the small guys deserve a chance... and everyone knows jig boats season only starts mid March.. so this proposal doesn't make any sense... and i would also like to vote in favor of proposal 55, it helps out the little guys.. and in these pressing times small guys deserve a chance.. thank you

Proposal 54: Oppose Proposal 55: Support



PC140

Submitted by: Samuil Reutov

Community of Residence: Homer Alaska

Comment:

I'm voting against daggers and pot boat's

Proposal 52: Support Proposal 53: Support Proposal 54: Oppose Proposal 55: Support



PC141

Submitted by: Vavil Reutov

Community of Residence: HOMER ak

Comment:

We can't let them take jig qouta there qouta is already big ,jiggers should be taking qouta from pot boats

Proposal 54: Oppose Proposal 55: Support



Submitted by: Sidney Richey Paulukaitis

Community of Residence: Hudson Oaks, Texas

Comment:

Dear Board of Fish Members,

I have fished in Larsen Bay. Kodiak holds a near and dear place in my heart. I have many friends who setnet in these bays.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

I am also opposed to proposals 66, 72, 73, and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely,

Sidney Richey Paulukaitis

Proposal 62: Support

Proposal 64: Support

Proposal 66: Oppose

Proposal 70: Support

Proposal 71: Support

Proposal 72: Oppose

Proposal 73: Oppose

Proposal 74: Oppose



Submitted by: Danielle Ringer

Community of Residence: Kodiak, AK

Comment:

RE: Strong Opposition to Kodiak Finfish Proposal #'s 62, 65, 67, 68, 69, and 70; Support of Proposal #'s 60, 66, 72, 73, 74.

Chairman Wood and Board of Fisheries Members,

My name is Danielle Ringer. I'm an Alaskan resident from Homer and have lived in Kodiak for going on 14 years where I work as a fisheries anthropologist studying fisheries access and well-being and own and operate a small-scale fishing vessel with my husband, born and raised in Kodiak. Fishing, and particularly salmon seining, are central to our livelihood and cultural identity and we are in it for the long haul. I ask you to please read comments, listen to testimony, and base your decisions off what you believe to be best for our fishing communities in the Kodiak region for generations to come.

I strongly oppose proposals 62, 65, 67, 68, 69, and 70.

The arguments in many of these proposals are using misleading data to portray an inaccurate story that setnet fishermen are facing challenges caused by seine fishermen instead of the numerous other issues that have

changed the setnet situation. Some of these include algal slime that can render their nets unfishable, fewer number of setnet permits holder participating in the fishery overall and not fishing for the entire season, and ecological shifts, such as migration, size, and abundance changes. Unfortunately, much of the justifications you'll read and hear in these proposals have employed cherry picked data to craft a grossly misleading argument placing seine families in their crosshairs.

Seiners have incredibly high overhead and operating costs compared to setnet sites due to vessel mortgages, continual maintenance, insurance, moorage, and fuel. Many family seine operations are having a hard time making ends meet with the current crushing financial situation of rising costs and falling fish prices. I oppose proposals to change our management plan to further restrict seiners when we are already conservatively regulated by our local ADF&G managers or seek to allocate fish between diverse gears and operations that were never meant to be the same by virtue of their many differences. This would lead not only to irreversible community rifts, but also increased travel time and lost opportunity that would raise operating costs for an already struggling fleet on top of economic and safety ramifications. Our regional community relies on salmon in many ways and these proposals would result in fewer landings snowballing lower fish tax and available work at local fish processing companies coupled with ecological impacts of overescapement in vital salmon systems around the archipelago. We cannot afford that.

All fishermen are struggling right now. We are facing unprecedented times of global market disruptions, geopolitical unrest, increasing inflation affecting operating costs and borrowing ability, and overall, an incredible amount of stress about the viability of our livelihoods moving forward. These proposals are not only inaccurately blaming one gear type for another's situation, but they come at a time when Kodiak needs solidarity and community support more than anything to get through these really difficult times. I am personally highly disappointed that such self-serving, damaging, and short-sighted proposals would be submitted that focus on pointing fingers and asking to hurt others rather than coming up with creative fixes to complicated problems that we're all facing.

I support proposals 60, 66, 72, 73, and 74 because I am interested in innovative tweaks to help my fellow community fishing families succeed while being ecologically sustainable and socially acceptable.

Thank you for your time as I know you have many comments to read. As you prepare to visit our region, please think on the incredible power that you have to impact our lives and the amount of stress that we have going into this cycle after a really challenging salmon season and right before a precarious Tanner crab fishery. I look forward to hearing from other community members and speaking with you during our upcoming meeting in Kodiak.

Wishing you a happy and healthy New Year!

Danielle Ringer, F/V North Star

Proposal 60: Support
Proposal 67: Oppose
Proposal 72: Support

Proposal 62: Oppose
Proposal 68: Oppose
Proposal 73: Support

Proposal 65: Oppose
Proposal 69: Oppose
Proposal 74: Support

Proposal 66: Support
Proposal 70: Oppose



Submitted by: Michelle Rittenhouse

Community of Residence: Kodiak, AK

Comment:

December 21, 2023

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, AK 99811-5526

RE: Proposal #62, Proposal #70

Greetings Chairman Moriskey and Board of Fish members:

Thank you for the opportunity to comment in advance of the Board meeting in January of 2024. I respectfully request that you oppose Proposal #62 and Proposal #70.

For three generations my family has called the west side of Kodiak Island home. Our livelihood has been shaped around the management structure of our salmon fishery. We have been fishing in the Northwest and Central Districts for 70 years. I have been a commercial fisherman for 30 years, and as a younger generation owner and captain of a salmon seine operation, Proposal #62 and #70 would be a death blow to the future of my business and the proper management and sustainability of Kodiak's salmon fishery as a whole.

The supporting science of these proposals is biased and it fails to encompass a wide range of preexisting conditions and factors presented by nature. These would include shifting weather patterns and ocean temperatures; higher sea lion populations raiding fishing gear; salmon migration patterns; the "brown slime" that coats nets in the water; etc. The pressures and strains the passing of these regulations could potentially create are unknown. It is absolutely not worth risking the stability of our tried-and-true management plan for the short-sighted benefits these measures may or may not produce for the set gillnet fleet. Taking away mine and hundreds of other families' right to go fishing as we have always known in no way guarantees an improved advantage for the setnetters over the elements of nature or the behavior of the salmon.

These proposals would be a catastrophe for young business owners such as myself, the seining fleet, and the local economy at large. Both would cripple efforts to manage Kodiak's salmon seasons as well as they have been for many generations. I would like to see our salmon fishery remain stable and sustainable for countless ages to come.

Thank you for your time and consideration. It is greatly appreciated.

Sincerely,

Michelle Rittenhouse

F/V Pamela Dawn

Kodiak Seiners Association (KSA) member

Proposal 62: Oppose

Proposal 70: Oppose



Submitted by: Shawna Rittenhouse

Community of Residence: Kodiak, AK

Comment:

December 21, 2023

Alaska Board of Fisheries

Board Support Section

PO Box 115526

Juneau, AK 99811-5526

RE: Proposal #62, Proposal #70

Greetings Chairman Moriskey and Board of Fish members:

Thank you for the opportunity to comment in advance of the Board meeting in January of 2024. I respectfully request that you oppose Proposal #62 and Proposal #70.

Kodiak Seiners Association is comprised of 107 active SO1K seine permit holders, local Kodiak and Homer businesses, and individual crewmembers. Our focus is advocacy for our membership through positive interactions with ADFG, the Board of Fisheries, and our state legislature.

I am in opposition to both Proposal 62 and Proposal 70, as set forth by the Northwest Setnetters Association.

My family has been involved in the Kodiak salmon fishery for 3 generations and is involved in both seine and setnet gear types. We depend on fishing for 100% of our income.

There are no guarantees that allowing setnetters to fish for 48 hours in advance of seiners would solve the problem of their declining catch. Multiple unnecessary closures would be detrimental to seiners, processors, and the local economy.

Allocating a certain percentage of the salmon run to the setnetters could create complexities within the current Management Plan that would have a detrimental effect on all gear types, Processors, and the local economy. There is no guarantee that it would solve the problem of their declining catch.

Other natural factors that are contributing to a decline in catch are an increase in the sea lion population, weather, and the 'brown slime'.

The pink runs have also changed dramatically in the past 15 years. Odd year pink salmon have changed in size and are much smaller than even year pinks. There is no gillnet web that setnetters can use to catch 5-pound reds, and 2-and-a-half-pound pinks simultaneously. The consistently mixed stock fishery of the central district would make it impossible to target each species separately for allocation. Especially for the limited amount of harvest time there is.

KSA respectfully requests the Board to reject this proposal. We thank you for the opportunity to comment on behalf of the membership of KSA. We appreciate the scientific and factual creation of designing regulation changes while applying the guiding BOF policies such as the Management for Mixed Stock Fisheries.

Thank you,

Shawna Rittenhouse

F/V Northern Jaeger

Proposal 62: Oppose

Proposal 70: Oppose

Dear Chairman Wood and members of the Board of Fish:

My name is Nate Rose, and I am a commercial fisherman from Kodiak. I participate in the state water Tanner crab, state water Pot Cod fishery, the jig fishery for rockfish and cod, Kodiak salmon fishery, and the federal Halibut longline fishery. I recently purchased a 56-foot fiberglass combination vessel that allows me the ability to participate in these fisheries as well as allow my family to join in our fishing pursuits.

I am writing in **support of proposals 54, 57, 60, 66, and 73.**

As one of three vessels that participated in the reopening of a portion of the jig cod quota in 2022, I can attest to the fact that the regulation change in 2020 worked as designed, and was a great success. The ambiguous language currently in place that reopens the fishery when the jig fleet is projected not to harvest the remaining quota by June 10 asks the department to look into a crystal ball and attempt to account for abundance of cod, participation by jig fishermen, and weather before making that determination. **Proposal 54** attempts to clarify the ambiguous language which would provide consistency for fishermen who participate in the pot fishery to know whether to put away pot gear or not. Ultimately, we want the full utilization of Kodiak's fishery resources and therefore unharvested quota is a valid concern.

Proposal 57 would help to alleviate the economic downturn of the commercial sac roe fishery in the Kodiak area, by allowing a portion of the sac roe quota to be rolled into a separate season in the fall when herring oil content is higher making it more desirable for food markets or bait markets. With nearly all the canned herring on the domestic market coming from Scandinavian countries, and our current local bait supply dominated by one harvester and processor, this proposal creates opportunity for expansion of herring utilization.

I ask the Board to consider supporting **proposal 60** to allow the seine fleet the ability to focus harvest effort in areas of the mainland district where pink and chum salmon returns are strong. The mainland district of Kodiak is home to very robust pink and chum salmon runs that have been largely forgotten in the board purview as a result of the focus on sockeye salmon harvest in this area, and it should be pointed out that a season is made in Kodiak by focusing on all species available to harvest. By volume, pink salmon and chum salmon make up the majority of my season in poundage, and being able to get away from the majority of the fleet allows me to capitalize when pinks and chums are abundant.

The greatest factor for my support for **proposal 66** is a cost savings. My boat is very shallow and I enjoy fishing areas where I tow my net very close to shore and every two years I must replace my lead due to the wear and tear on the "boat end" of the net. If proposal 66 were to be passed, I would be able to recycle black body web into my "lead" end of the net regardless of whether it had smaller holes in it. I have heard this proposal raises concerns about making seiners more effective because we lose fish through the 7" lead web, which is entirely false. When I am towing on my net, a 7" mesh will be pulled more into a sideways diamond with such a small opening that even the smallest of pink salmon would have a hard time squeezing through.



Proposal 73 would be a response to our most recent even year pink salmon returns to the Sturgeon River. I personally love to fish this area when it is open, as it is shallow and rocky and therefore challenging. In 2020 a large component of my pink salmon season was made by fishing this section of coast line. I think it is important for the board to realize that the time frame this proposal seeks to address is before the start of strength of the late run sockeye returning to Karluk. After speaking with department staff regarding the proposal I understand the proposal as written does not provide enough protection for late run sockeye, and hope that we can work with the Board and the department to craft language that allows for those protections while also providing seiners the ability to harvest excess pinks in this area.

Dear Chairman Wood and members of the Board of Fish:

My name is Nate Rose, and I am a commercial fisherman from Kodiak. I participate in the state water Tanner crab, state water Pot Cod fishery, the jig fishery for rockfish and cod, Kodiak salmon fishery, and the federal Halibut longline fishery. I recently purchased a 56-foot fiberglass combination vessel that allows me the ability to participate in these fisheries as well as allow my family to join in our fishing pursuits.

I am writing in **opposition of proposals 62, 65, 68, and 70.**

Proposals 62 and 70 raise the same concerns and for brevity's sake, I will write to them both. These proposals are written with the same underlying assumption that seiners are the cause of setnet productivity, and that our efforts out on the capes has lessened the viability of the setnet fleet. You will see and hear plenty of data to refute these claims, and it is important to recognize variables that have had an effect on the setnet fleet such as algae slime, increased sea lion predation, smaller fish size, and ultimately fewer fish than in the past. Please don't attempt to take action on these proposals attempting to fix a setnet's ability to catch fish, a guaranteed outcome will be a loss to seiners without a measurable gain to the setnet fleet. Our seasons in Kodiak are made by our ability to fish the entirety of the season, days matter to seiners the same as they matter to set netters, and just because we have the ability to move, doesn't mean it is always feasible to do so.

I would urge the board to oppose **Proposal 65**, as it is a targeted attempt at a very small number of seiners that utilize pilots, and will be almost unenforceable. There are only about 5 vessels that utilize pilots on a regular basis, and every one of these vessels uses a pilot to find fish where there aren't other boats as Kodiak is such a large management area. This doesn't diminish opportunity for other members of the fleet, in fact, quite the opposite. These pilots are members of our community as well, so the trickle-down effect of money generated by their services trickles back through the community.

Proposal 68 fails to recognize the current coho management plan in place for the Karluk river. Currently after September 5th, the Inner and Outer Karluk sections are managed for late run sockeye and coho returning to the Karluk River. The Department has managed these sections very conservatively for coho in recent years, while still attempting to curb the over escapement of late run Karluk sockeye. This past summer, I fished until September 27th on 54-hour weekly openers to conserve coho stocks, even though the sockeye run could have supported much more intense harvest pressure. Under this proposal, the opportunity to the fleet to participate in the inner Karluk openers for sockeye would not have occurred and the Karluk river would have experienced drastic over escapement on late run sockeye. For many, the ability to fish late this year was the deciding factor of being able to make a boat payment or not.



RE: Opposition to Kodiak Finfish Proposal #'s 62, 69, and 70.

Chairman Wood and Members of the Board of Fisheries,

My name is Steven Roth and I am the owner and operator of the fishing vessel, Sea Grace. My wife and I use a purse seine to catch salmon in the Kodiak Management Area. Every year I employ four young people during the Kodiak salmon season, and several others (all state residents) year-round working on vessel maintenance, projects, etc. We are a true Alaskan, family run, small business. I have fished in Kodiak for 40 years and hope to fish for another decade or two. My two sons, nephew, and grandson own their own fishing vessels, and another grandson owns a permit, but is saving to purchase a vessel in the future. All of them fish in Kodiak and I hope that whatever decisions are made, are forward thinking and take into consideration the viability of a fishery that is just as important to me and my family as it is to the State of Alaska, and the communities of Kodiak Island.

I do not support proposal numbers 62, 69, and 70.

Every fishery has times of famine and times of plenty, there are many variables from stock returns, weather, market, global pressures, management, mechanical, and personnel. I think it is important to not lose sight of the fact that we are running businesses that require hard work, flexibility, ingenuity, and innovation. This last season was hard for all salmon fishermen in Kodiak regardless of gear type. I think the answer is hard work and innovation in the face of temporary adversity, not taking from neighbors who are also hurting so that we can hurt less. **I would be open to answers that are innovative, not allocative.**

Kodiak is a challenging area to fish, which is why permit prices are often much lower than other areas. The Kodiak Management Area 2023 Season Summary reported that of the 371 purse seine permits, 45% were actively fishing in 2023, which is the same as the 2013-2022 average, while of the 183 set-gillnet permits in the Kodiak region, 65% were fishing, but this is 10% lower than the 2013-2022 average demonstrating there were fewer set gillnets in the water than usual resulting in lower catch numbers. While some purse seine vessels may be more efficient than in the past, there are still many smaller vessels that fish Kodiak Island and there are fewer active fishermen than when I started fishing 40 years ago. **85% of the Kodiak seine fleet permit holders reside in Alaska, while 68% of the set gillnet permit holders reside in Alaska** (current CFEC numbers). I do not think it is wrong to live in another state and fish here, but I do think it is relevant that **this decision will disproportionately impact state residents**. My family stands with our fellow Kodiak set gillnet fishermen in this difficult time, but ask that the Board of Fisheries NOT pass these proposals as they are not the answer to the current challenges we face.

Thank you for your time and careful consideration toward a better and fishier future for all of us,

Steven G. Roth, Captain, F/V Sea Grace

Greetings Chairman and Board of Fish members.

We are **ALL** hurting from the current economic situation of the fisheries.

My name is William Roth, and I own and operate the Sea Chantey. I grew up fishing in Kodiak, salmon seining since I was born. I'm married into a long time Set Net family in Cook inlet. My inlaws are the Blossoms who have homestead in the cook inlet since the 60's. Many of the board members receiving this letter probably know several of the Blossoms, as you recently supported proposals that have destroyed the fishery and several of the sights that have been up and running for over 50 years are no longer operating in the name of special interests, and have over escaped the kenai river run and hide the numbers by pulling the weir early every year. It's truly a waste of a natural resource that our state has been blessed with. If you read below your own legislation says that the purpose of the board of fisheries is as follows: "For purposes of the conservation and development of the fishery resources of the state"

It says plainly not only are you to conserve fishery and resources in the state, but you are also to develop them. *The definition of develop is as follows: grow or cause to grow and become more mature, or advance. You have failed the Cook Inlet set netters and failed to carry out the obligation you were elected to and did not conserve the fishery or develop it, instead you have caused the death of a fishery by a thousand cuts. You have allowed this by simply letting poor proposals pass that are not written using facts or biology but are simply proposed via feelings and theories.

Article 2

Sec. 16.05.221. Boards of fisheries and game.

(a) For purposes of the conservation and development of the fishery resources of the state, there is created the Board of Fisheries composed of seven members appointed by the governor, subject to confirmation by a majority of the members of the legislature in joint session.

Please consider looking carefully at the numbers presented below to see why you should **NOT** support Proposals 62, 69, or 70 and **Should Oppose** those 3 proposals.

Within the 3 proposals they state the following or similar statements:

"The percentage of sockeye salmon harvested by Westside set gillnetters out of the total of all sockeye salmon caught by all gear groups in the Northwest Kodiak District, Telrod SHA and Inner and Outer Karluk Sections of the Southwest District has declined from a 23-year average (1990-2012) of 50% to a 34% average in the years 2013-2022.

The percentage of pink salmon harvested by Westside set gillnetters out of the total of all pink salmon caught by all gear groups in the Northwest Kodiak District, Telrod SHA and Inner and Outer Karluk Sections of the Southwest Kodiak District has declined from a 23-year average (1990-2012) of 30% to 19% in the years 2013-2022."

This however is not taking into account that according to the 2015 Kodiak Management Area Season Summary released by the ADFG states that 82% of setnet permits were actively fishing. While during 2023 only 65% of setnet permits were fishing. While Seiners have had a steady percentage of permits being used at 45% of permits fished. This Shows a decrease of 17% but that's not the whole story, if you manage to understand simple math the actual percentage decrease of setnetters fishing is a 21% decrease in set netter permits fishing. So naturally we expect the set netters to catch 21% less which leaves us with the following 11% left over that the set netters have caught less. Which can simply be accounted for by a lack of effort on the outer coast where there is miles and miles of open setnet area, very little effort has been put forth to fish from miners point to chief point. The fishery has evolved in Kodiak as seiners have moved out to the capes more, rough weather and harder working conditions has been a result, in response to that the fleet has evolved and it should be no different for the setnetters. We live in a free market and the setnetters have the ability to evolve as well.

In 2023 the average boat in Kodiak grossed \$131,586 per fishing permit, the lowest since making it the 2nd lowest following 2010, the first being 2016, which the state declared an emergency disaster year.

The dollar in 2016 was worth \$1.28 today, making 2023 one of the worst years ever for the Kodiak fishery taking inflation into account. With record low prices and climbing operation expenses the average boat in Kodiak is running a fine line margin and if these proposals pass it simply would destroy the fishery for about half the Kodiak fleet.

Not only that, kodiak had strong runs in 2023 with horrible prices, the kodiak seine fleet cannot sustain itself currently at these salmon prices if additional fishing time was taken away and average or below average year happened, the state would have to declare another disaster year in order to prevent an economic disaster in the small communities of Alaska.

I know personally if these proposals pass I will be moving to a different area with more opportunity and would leave the kodiak seine industry. As vessels leave and fishermen quit due to a poorly managed fishery, you destroy jobs, income for the state of Alaska, the ADFG department, and the communities throughout the greater Kodiak area.

Letting these proposals pass would not be fulfilling your duty as a board of fish member and would be destroying a fishery instead of developing a fishery. Yet again causing a death of a thousand cuts to the commercial fishing fleet due to poor management of a resource.

Please Oppose proposals: 62, 69, and 70 to preserve an economic and a sustainable fishery that has been operating for more than 50 years.

Thank you for hearing me out.
Sincerely, William Roth



Submitted by: Bruce Schactler

Community of Residence: Kodiak, Alaska

Comment:

I am in complete support of this long needed proposal

I am also attaching my comments in a separate document.

Kodiak Alaska

Board of Fisheries

Proposal 57

The change to herring management in this Kodiak Herring proposal #57 is needed, as the sac roe market continues to decline.

Most of the allowed, biological herring harvest in Alaska will once again go unharvested in 2024 due to the failing market for 'roe herring' that has been the case for many years now.....from initial quota suggestions from ADFG, the unharvested portion will likely be over 100,000 tons! It is unclear at this time if any of the roe herring quota in Kodiak will be purchased!

To change the options and direction for such underutilized Alaska herring, management must change to allow harvest to take place when the herring are past their spawning phase, and into the high fat or better/different stage of life when the fish's nutritional profile is comparable to all other uses of this valuable State of Alaska resource!

The need to diversify and bring new value to the herring fishery cannot be understated. New Product made from herring, be it canned, pickled, or smoked requires higher fat and or better nutrition profiles. This can only be realized after the herring have been feeding for 5 or 6 months past spawning.

As you can see in the attached study of the North Atlantic herring fishery, that includes some 500K tons of herring (down to 390K for 2024), the possibilities for the market expansion of Alaska herring is clear. As a frame of reference, Norway alone exported over 70,000 tons of herring fillets in 2023, which figures back to approximately 200,000 tons of whole fish.

<https://www.alaskaseafood.org/resource/alaska-herring-market-recovery-project-report-2022/>

The 2023 average price paid to the fishermen for this fishery has been \$750 per ton.

On the Pacific side, Russia harvested a similar amount that was either consumed domestically or exported into this same world market for herring....both to Asia and Europe.

Kodiak is unique in Alaska, having generally, the right size herring and the geographical access for harvest, as the herring accumulate and school during the fall and early winter where the nutritional profile is at its peak.

For the last 40+ years, there has been a small set aside of 7-10% for "bait" in various Alaska herring fisheries, but the old roe market, SOA management and associated massive investment to produce for that market has

dominated all other aspects of the fishery. The SOA has begun to address this change in small ways, such as the removal of the word “roe” in the fishery description relative to the Togiak (Bristol Bay) fishery.....it is now, simply the Togiak herring Fishery.

This same name change is proposed here for the Kodiak herring fishery.

One may argue that there are no new markets for any form of Alaska Herring, but as I have pointed out, well over 90% of Alaska herring has been regulated for the Japanese “roe” market only. The remaining limited use has been for local bait. The vast majority of the Alaska herring fishermen have been put out of business by the crash of the Japanese roe market, stranding equipment and investment.

To create new Wild Alaska Seafood products and to expand the markets from those products, the producers must first have access to the needed raw product, which spans the entire life cycle timeline of our prolific, but now much underutilized, Herring resource.

Current management must change before new access to an expanded resource is realized.

Until the potential new producers and the associated new markets have access thru new a management scheme, there can be no realistic planning or needed investment for new products and markets.

Currently, our US domestic market has pickled herring produced with Norwegian and Canadian herring, European produced smoked and canned herring, Atlantic Coast and Russian herring for bait, as well as various kinds of “cured” herring from Canada, Iceland and Norway.

Alaska herring now has a “specification” in the USDA for potential use as a canned product in their export food aid programs.

The Alaska Seafood Marketing Institute (ASMI) is actively making markets aware of our herring resources thru domestic and international program activities, including nutritional studies showing the significant benefits of eating herring.

- 1). <https://www.alaskaseafood.org/species/herring/>
- 2). https://www.alaskaseafood.org/wp-content/uploads/210808_Blding-Evidence-Can-Herring.pdf
- 3). https://www.alaskaseafood.org/wp-content/uploads/Liberia_HerringReport_10_13_15-1.pdf
- 4). https://www.alaskaseafood.org/wp-content/uploads/210808_Uganda_1pg.pdf
- 5). https://www.alaskaseafood.org/wp-content/uploads/161020_Herring-Recipe-book-6-Final_5.5x8.5-Copy.pdf

This collection of recipes was produced from a 3 year promotion in Seattle. This promotion was titled “NW Herring Week with Alaska Herring”. Over 50 restaurants and retail outlets took part.

Additionally, the process is underway for the Responsible Fisheries Management (RFM) sustainability certification for Alaska herring which will make it the only sustainable herring fishery in the world other than an “area” portion of the Norway fishery.

This certification will put Wild Alaska Herring firmly in play as a preferred raw product for the retail markets that demand such certification.

To add further promise for Alaska Herring, I will note that the dominating herring fisheries I have referenced above are all in a period of decline and generally not classified as sustainable. (Down 24% for 2024)

Finally, the SOA Administrations, and the SOA Legislature have advocated, supported and called for change and new development of the Alaska herring fishery for the last 20 years. This support includes financing for research, development equipment and marketing.

Everything is in play and the table is set for Wild Alaska herring to realize a new place in the world market place....all that is left to realistically move forward, is access to the needed raw product, and that will happen with the passage of this proposal.

Bruce Schactler

Kodiak, Alaska





Alaska Board of Fisheries
Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Proposals 62, 65, 70, 73

Dear Chairman Wood and Board of Fish members:

My name is Zack Schmeil and I am a commercial fisherman in Kodiak. I participate in the tanner crab, halibut, and salmon fisheries on my family's 56 foot seiner. I am writing to voice my **support for proposal 73, and my opposition to proposals 62, 65, and 70.**

I fished the Sturgeon Section in 2020 during the last week in July, and first week of August and it was at the time the best pink salmon fishing in the state. The Sturgeon River was open during that time to the river mouth as there was a surplus of pinks escaped into the river, however that section of coast line was managed based on late run sockeye and on pink salmon returning to Karluk. Proposal 73 gives the department flexibility to manage the Sturgeon section for sturgeon pinks as well as the Karluk runs. Flexibility for management is always a good thing, as it allows for maximum yield.

I oppose proposals 62 and 70, as these proposals would take away time and area from seiners and in this current economic climate these are losses we cannot afford. Proposal 70 is especially frustrating as it is founded on the idea that every fish taken away from the seine fleet will be harvested by the setnet fleet, although it should be pointed out that on year like this year, 2023, there wasn't a setnet fishing after September 7th. This proposal would simply strand fish under the allocation, leading to lost harvest opportunity and lost revenue to our community.

I sincerely hope the Board recognizes that these proposals carry heavy weight for our community, and could result in changes that could devastate our local economy. Please consider the impacts of these choices and trust the science and the department of Fish and Game recommendations regarding the sustainable management of our fishery.

Sincerely,


Zack Schmeil



PC151

Submitted by: Zosima Serebrekoff

Community of Residence: Homer, Ak

Comment:

I'm commenting about proposal 54, on behalf of jiggers, it is unfair to let the pot fishermen take our quota away when we've basically just started fishing, pot boats can fish earlier when the fish is in deeper waters, our season begins in march when the fish starts schooling up in shallower grounds, the majority of the fish jiggers catch is caught in April, it makes no sense to cut the jiggers short in March before their season has began, please consider leaving our quota be

Proposal 54: Oppose



PC153

Submitted by: Devin Skonberg

Community of Residence: Kodiak, AK

Comment:

My name is Devin Skonberg and I'm originally from the village of Ouzinkie. My grandfather and I own the seiner Lorena Marie, which has been in my family since 2007. I am a 3rd generation seiner and one of the last salmon fishermen originally from Ouzinkie. Ouzinkie used to have many seiners, but now there are just two of us. I have spent pretty much all of my career fishing in the central section, so proposals 62 and 70 would leave me with very little area that I can fish. I am opposed to these proposals because they would basically put me out of business. This is how I feed my family and it's my only way to make a living.

I support proposal 60, which would give Kodiak seiners more fishing opportunity when there are plenty of pinks and dogs on the mainland.

Proposal 60: Support

Proposal 62: Oppose

Proposal 70: Oppose



SSRAA
Southern Southeast Regional Aquaculture Association, Inc.
14 Borch Street, Ketchikan, Alaska 99901
P: 907.225.9605 F: 907.225.1348

December 26, 2023

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: **PROPOSAL 59**

Chairman John Wood, Members of the Alaska Board of Fisheries,

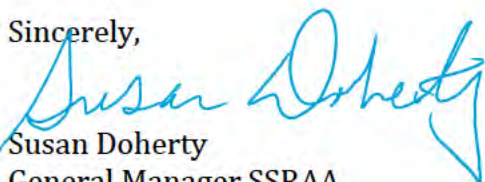
The Southern Southeast Regional Aquaculture Association (SSRAA) submits the following comments concerning the Board of Fisheries decision at the Lower Cook Inlet meeting to withdraw Proposal 59 from consideration.

SSRAA **supports** the board's action due to the ambiguity of the proposal language, and subsequent edits to the original submission, which created even further confusion and added statewide implications.

SSRAA would welcome meeting with the chairman while in Kodiak to address how the operators and the BOF can provide a productive avenue to address concerns, provide factual information, and do our best due diligence to harvest wild and enhanced fishery resources, while protecting future returns. Emerging data surrounding the impacts of a warming ocean, and the environmental factors created, may cause long term negative impacts that the best of management and regulatory intervention cannot mitigate for. It is in Alaska's best interest to fully understand these interactions so we can address these changes rationally and not emotionally.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Susan Doherty".

Susan Doherty
General Manager SSRAA



Submitted by: Richard Starr

Community of Residence: Kodiak, Alaska

Comment:

Alaska Board of Fish and to whom it may concern:

My name is Richard Starr. I am submitting my letter in opposition to proposal 57. I have been involved in the food and bait herring fisheries since the early 1980s. I have participated in this fishery as a crewman, Captain, and a permit holder.

The food/bait herring fishery has successfully operated for many years as a co-op, due to its small quota. My recollection, prior to limited entry permits, is that there were management challenges (several boats were fishingsmall quota, a lot of different areas.)

With an increased Guideline Harvest Level (GHL) more currently permitted fishermen could participate and fill the quotas. There has been effort over the years to establish a larger market for food/bait herring, it has been a challenge.

This proposal is not justified to give, alter or devalue limited entry food/bait herring permits to people who have never participated in this fishery or sold their food/bait herring permits and want them restored without cost to them.

This proposal would be creating an A and B season allowing sac roe permit holders to fish in the food/bait herring fishery in Kodiak which is a limited entry fishery and should stay as such.

I strongly oppose this proposal.

Thank you,

Richard Starr

Proposal 57: Oppose



Submitted by: Tami Starr

Community of Residence: Kodiak, Alaska

Comment:

Alaska Board of Fish and whom it may concern:

My name is Tami Starr. I have lived in Kodiak Alaska with my husband Richard since 1987. We are a fishing family and have been since the late 70's. I strongly oppose proposition 57.

This particular proposal causes several questions to arise. Because we are a minority of permit holders is the requirement to devalue our asset just a majority of voices? Is it ethical that because of greed you can dilute and infringe on our livelihood and steamroll our earned equity in this fishery?

If that's the case there are several fisheries my family would appreciate being included in that are currently limited entry.

I am aware that permits have already sold and the holders paid...and now one of them is leading this charge to return to this fishery after profiting from the sale of their own permit...How is that even legal? Are all limited entry permits up for grabs to the loudest voices? This is wrong!

Quite obviously I am in opposition to proposal 57.

Thank you for your consideration,

Tami Starr

Proposal 57: Oppose



Submitted by: Katie Story

Community of Residence: Uvalde, Texas

Comment:

Dear Board of Fish,

I am a Kodiak setnet permit holder, fishing in Uyak Bay since 1977. I was born in Kodiak in 1968 and my family has been setnetting since I can remember. My father worked hard and built up his business from nothing because he loved it and still does. My brothers and all of our family at Rocky Beach Fish Site would like for our business to be a better source of income. We respect that there needs to be regulations that are fair to all.

I am writing in support of proposals 62, 64, 70 and 71, submitted by the Northwest Kodiak Setnetters Association. Setnetters in the Central Section of the Northwest Kodiak District have been losing historic harvest percentage to the point where the fishery is in danger of not being viable anymore. These proposals aim to reverse that trend.

The fear is that we will lose the opportunity to continue to be a family business. It is getting to the point where parts of the family are having to find ways to subsidize income which makes it so hard for the few left to run the

business on their own. Unfortunately there's the catch 22 which means finding ways to make money elsewhere while leaving the skeleton crew which can not be efficient to run the nets the way they should be fished. So work twice as hard and twice as long to get the few that we can.

I am also opposed to proposals 66, 72, 73,

and 74, which would increase opportunities for the seine fleet at the expense of the setnet fleet, which is already failing.

Thank you for your consideration.

Sincerely, Katie Story

December 23, 2023

Alaska Board of Fisheries c/o Boards Support
P.O. Box 115526
Juneau, AK. 99811

Chairman Wood and members of the Board,

We are writing today to oppose Proposal 63, permit stacking in the Kodiak salmon setnet fishery.

We own and operate a setnet operation on the Southend of the island, in the Alitak District. Though we are lifelong salmon fishermen with experience in multiple other management areas, we are new entrants to the Kodiak salmon fishery, and will be going into our 3rd season in 2024. The foundation of our opposition to this proposal is a desire to see a new generation of fishermen continue to invest in the Kodiak setnet fishery, and we are concerned that the consolidation that results from permit stacking does not serve that future.

The appeal of permit stacking for some individual operations is understandable, particularly in years of low returns. Perhaps an appropriate permit stacking option would be one deployed exclusively as a mechanism to sustain struggling small scale operations at times of low abundance. However, that is not how these regulations are designed to function, and is unlikely to be the primary motivation for stacking. We are concerned that the negative impacts are likely to substantially outweigh the benefits.

Permit stacking is almost certain to consolidate access, likely among the more established site owners. We can expect this to be followed by an increase in permit costs, which further decreases accessibility for new entrants and smaller operators. Owners focused on and financially able to build large and/or expanding operations are more likely to consolidate both permits *and* the critical infrastructure associated with them. So there is a potential for permit stacking to not only make permits less accessible, but all of the other assets associated with a successful setnet site as well, resulting in less opportunity for the next generation. There is also a direct link between consolidation, and the migration of permit ownership out of state, which has long-term consequences for coastal communities and for Alaska's future fishermen. We appreciate our setnet neighbors regardless of residency, but there is an overarching value in ensuring the opportunity for Alaskan participation in local fisheries remains strong.

Again, at times of particularly low returns, an individual holding and fishing a second permit could certainly increase harvest opportunity with potentially less overhead expense. But that opportunistic consolidation, while beneficial for an individual business in the moment, is detrimental to the fabric of the fishery in the long-term. It's also not the only way to address challenging times. While we are all feeling the squeeze of depressed runs and a poor market, it's important that our solutions to those challenges prioritize run rebuilding, market innovation and other stabilizing factors that

bolster the value of existing access mechanisms, without instigating access changes that create long-term negative consequences.

Setnetters already have the ability to address diminished returns through additional permits by increasing the permit holders fishing within their operation. Though understandably that's not always a viable option. Our hope for our small scale fisheries, however, is that we support opportunities where crew are motivated and empowered to buy their own permit - not just hold it for the operation owner - as a means to work their way into a fishery. Concentrating control of fishing access among fewer individuals isn't going to solve Alaska's market crisis, rebuild struggling runs, or improve availability of reliable crew. Making it harder for a new entrant to incrementally build their own equity investment toward an operation just creates additional challenge.

It seems there are two primary motivations for this measure, as addressed by the proposer. One, to consolidate access so that individual operations are more valuable -- good for some individuals but a disservice to the long-term future of the fishery. And two, to artificially increase the cost of permits so that harvesters wanting to exit the fishery can sell at a higher rate and recoup "stranded equity," regardless of what that fishery access is *actually* worth. The purpose of limited entry permits is to create an orderly fishery, and manage participation for resource conservation. It is not a guarantee of business viability or retirement equity, and was never intended to be. Making a major management change in order to provide that certainty to individual operators, as a direct cost to future operators who will be responsible for adapting fishing operations in an uncertain future, would be a mistake.

We care deeply about the communities across Kodiak Island, and about all our neighbors on the southend. We want to see Kodiak's fishermen remain successful. In doing so, it's important that access rights and regulations be managed according to a long-term vision for community success, not for individual business plans. That community success needs to include viable access for next generation, diverse and local participants. Given that ultimate priority, we can't support any measures that further consolidate access, particularly in small boat fisheries that are such critical opportunities for new entrants and community-based fishermen. Thank you for your consideration.

Sincerely,

Hannah Heimbuch & Michelle Stratton
Twin Peaks Fisheries, Kodiak, Alaska

December 23, 2023

Alaska Board of Fisheries c/o Boards Support
P.O. Box 115526
Juneau, AK. 99811



Chairman Wood and members of the Board,

I am writing this comment letter on behalf of the Under Sixty Cod Harvesters (USCH). Our members are under 60-foot vessels that harvest Pacific cod with pots in state-water fisheries. Our vessels are primarily owned, operated, crewed and maintained by Alaskans, and based in Alaska ports. Several of our members are homeported in Kodiak.

USCH opposes Proposal 53, allowing longline slinky pots in the Pacific cod state water pot fishery. Our opposition is based on several concerns that this substantial change would introduce significant uncertainty for both management and the existing pot cod fleet.

Fundamental Change to the Fishery & Participants

This proposal would introduce a new gear type, and new fleet, into a fully allocated, very well managed and successful state-water fishery. While they are called pots, *slinky* pots are markedly different from any of the pot, longline or jig gear historically used to harvest Pacific cod in the Gulf of Alaska broadly, and Kodiak specifically. The Kodiak Pacific cod fishery is currently prosecuted with single pots and jig gear, under separate Guideline Harvest Levels (GHLs). Both sectors are well established and have significant participation and investment from Kodiak residents.

As noted in the Alaska Department of Fish and Game (ADFG) comments, Proposal 53 would likely result in the introduction of new participants to the Kodiak pot fishery, very likely from the under 50 hook-and-line fleet. We would like to emphasize that there are existing Pacific cod opportunities for this fleet, including the state waters fishery in Prince William Sound and the Gulf parallel federal fishery. Expanding the Gulf HAL fleet into the Kodiak state waters pot-cod sector would be a change in allocation that largely directs additional opportunity to a HAL fleet experimenting with gear modification, and decreases opportunity & efficacy for the actual Kodiak pot fleet. (*More below re: participation impacts.*)

While every fishery undergoes iterative review over time, the Kodiak Pacific cod fishery is already foundationally sound, and working well for participants, the local communities, and management. The fleet most likely to benefit from this substantial change is an established non-pot fleet with existing opportunity elsewhere. USCH does not see rationale for a fundamental change to the participant make-up of the Kodiak Pacific cod pot fishery.

Increased Management Uncertainty

We have seen significant fluctuations of the Gulf of Alaska Pacific cod stock in recent years, largely thought to be driven by episodes of particularly warm ocean temperatures in the North Pacific. This is a leading example of the ecosystem variability our fisheries face.

Management and harvest stability is critical to responding appropriately to biomass and ecosystem changes, and continuing to prosecute an effective and responsible fishery. Predictability of harvest rates and fleet capacity is an important part of that stability, one that we are concerned would be undermined by this proposal.

As noted in ADFG comments, the likelihood and unpredictable scale of increased participation, combined with the unknown CPUE of slinky pots in this fishery, will make managing within set limits more difficult, and increase the likelihood of “*GHLs being over or under harvested more frequently*.” (ADFG). While ADFG is neutral on this proposal given its allocative nature, we urge the Board to consider the multiple ways the Department noted increased uncertainty as a likely result of Proposal 53.

Impacts of Increased Uncertainty, Participation and Gear Conflicts

The impact of increased uncertainty on management and the fleet is illustrated by the already short nature of this fishery. In the past 10 years, the fishery has averaged 19 participants, and 21 days in length – shorter in recent years. In 2022, the fishery was officially open 15 days. In 2023 it was 10 days. Both years had 16 participants. Increased participation inevitably shortens fishery timing. Operating an orderly fishery within an even tighter window *and* with additional, less predictable participants, puts undue strain on managers and harvesters. Additionally there is an increased potential for costly gear conflicts, which harvesters currently experience in areas of longline/pot gear overlap, and in BSAI fisheries where longlined pots and single pot fisheries share grounds (i.e. sablefish and Pacific cod).

Harvesters are already operating within the limitations of short seasons, difficult weather, and a depressed statewide seafood market that has significantly impacted Pacific cod dock prices. Given depressed prices, the potential for increased losses from gear conflicts, the variability of winter fishing weather, an increase in competition for lower-than-average catch limits, and the overall combined risks of gearing and crewing up for a season that could be less than a week, it is possible that existing Kodiak pot cod vessels could be precluded from participating in the Kodiak pot cod fishery with the introduction of additional uncertainty.

USCH members independently, and our organization overall, have long been supportive of managing fisheries to support small-boat opportunities. Kodiak currently has a diversified fleet of small, medium and large boats able to prosecute the statewater cod fishery. This includes an established resident fleet of jig operators using small vessels, and an established resident fleet of pot vessels. While slinky pots have been successful in some fisheries, they are not right for every fishery. Recognizing that this proposal would fundamentally change participation, and increase management and harvest uncertainty, we urge the board not to support Proposal 53.

Sincerely,



Todd Hoppe, *Board President*. Under Sixty Cod Harvesters



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



December 23, 2023

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
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dfg.bof.comments@alaska.gov

Chairman John Wood, Members of the Alaska Board of Fisheries:

The Valdez Fisheries Development Association Inc, (VFDA) submits these comments in support of the Board of Fisheries decision at the Lower Cook Inlet meeting to withdraw Proposal 59 from consideration in Kodiak. This action by the board was correct and reasonable, given the vagueness of the proposal and its statewide implications to Alaska's fisheries and hatchery programs.

VFDA has submitted significant public comment and in person testimony over the years opposing this proposal in all of its many forms. Proposal 59 and others like it, have sought unsuccessfully to find justification for adoption siting; improper hatchery regulation and management plans, unsubstantiated conservation concerns, opinions on the Board's authority to regulate hatchery permits and undocumented agreements purportedly made by hatchery operators. None of which has been found to be plausible by the Board.

Respectfully, we would ask that Proposal 59 remain removed from any future board deliberations. We would also suggest that strong guidance be provided to the public, that future hatchery proposals which have significant and far-reaching statewide implications, be submitted in a way that permits maximum stakeholder engagement and be supported by fact and scientific data.

Thank you.

Sincerely,

Mike H. Wells
Executive Director



PC161

Submitted by: Corina Watt

Community of Residence: Rochester, WA

Comment:

Proposal 63, we support permit stacking. We are family operated and owned business. I have been a permit holder and participant in this fishery for 3 decades. My husband and I and our three boys own and operate our fishing business. Strongly support permit stacking for the following reasons:

- 1) Sustaining the set-net fishery permit holder participation has been in steady decline in the Alitak District over the last three decades.
- 2) Economical, we hold 4 permits and need to fish all four continuously throughout the season. We are in a constant struggle to survive rising costs and unpredictable prices we like most are subsidizing our business just to sustain participation.

Proposal 63: Support



PC162

Submitted by: Jason Watt

Community of Residence: Rochester, Washington

Comment:

Proposal #63

As a set net fisherman owner on the south end of Kodiak Island I am in favor of permit stacking for set net fisherman. In the past people have argued against it claiming that it puts people trying to get into the fisheries at a disadvantage. Times change and it is all but impossible to make it in this fishery without multiple permits. Our fishery and the canneries have been in steep decline and in order to survive this the few remaining sights have been forced to cut back like no time in our history. This fisheries is on the verge of total collapse and we need any help we can get.

Proposal 63: Support



PC163

Submitted by: Ross Weller

Community of Residence: Kodiak

Comment:

I don't support proposal 49 as written. I'm open to a possible change but this is too restrictive.

Proposal 49: Oppose



Submitted by: Anitra Winkler

Community of Residence: Kodiak, AK

Comment:

Dear Board of Fish Members

My Name is Anitra Winkler. I am 30 years old and a lifelong Alaskan. I grew up in Cantwell went to college in Juneau and I have also been in the westside Kodiak salmon setnet fishery since 2010 and a site owner since 2017. I am writing you to encourage support for proposals 62, 64, & 71 as well as opposition for proposals 72, 73, & 74.

It is apparent to me that without some sort of change set netting in Kodiak may not survive as a viable commercial fishery. It is becoming increasingly difficult to find and retain crew (because it's hard to pay them enough) and I know of a couple of young people who crewed in the fishery and were interested in buying sites themselves but the finances made it not reasonable. It's important to point out that all of this has nothing to do with the price crash we are dealing with now. This has been an on going problem for years where we had good prices.

Setnets have less opportunities. Kodiak is one of the only places in Alaska where two different gear types fish without any time or area separation. We are not allowed to fish on most of the island. We can only be in the central section of the NW district or on the south end. We cannot fish in terminal areas including we are not allowed to fish the Telrod SHA and we can't fish at Kitoi the hatchery. Long story short the mobile gear type can try to catch the fish before they get to us, in the same area as us, and then again when they are past us. Further we never benefit from a "mop up" opening. These kind of inner bay clean up openings actually come partially at our expense because we will be closed to achieve the buildup but then we can't participate when the fishery is in catch up mode.

Gillnets are a slow and inefficient gear type - we need time to catch fish. That said the single biggest way to help us is to give us more fishing time, particularly fishing time where we are not competing with the other gear type. Proposal 62 best addresses this.

Proposal 64 bigger hooks would be a small increase in production and would make our hooks more convenient to pick. The way it is now I have hook panels that I can barely fit my skiff in. Hooks are key to gillnetting in Kodiak as we are targeting pinks as well as reds and our water is generally very clear as opposed to the silty/murky water of Bristol Bay ect.

Proposal 71 is mostly a housekeeping proposal. It gives the department another option and would help us achieve escapement a little faster, allowing more fishing opportunity in the central section.

Proposal 63 permit stacking I am not particularly opinionated about but a lot of people are. I am one of the youngest non-family operation permit holders in the fishery and I personally have no issue with it. I don't believe its going to make buying in significantly harder and from a crew persons perspective if you are crewing for a multi permit operation you are going to make more money. I do know that this would make life easier for family operations with multiple permits and kids in school ect.

Proposals 72 and 73 I oppose as they would increase targeting of fish before they reach the central section as well as slow down reaching escapement goals which would negatively impact fishing time in the central section.

I would also like to voice my strong opposition to proposal 74. Proposal 74 as it is written would be death sentence for set netters. A site could hire a crew get ready to fish and then spend most of the summer on the beach. This could even happen on a season that may have had a strong forecast but that particular bay was weak. From a business standpoint this is unsustainable, it is just not a reasonable way to run a business. This puts the burden of conservation unequally on set netters, who ironically can't even benefit from fishing in the inner bays that this proposal is hoping to beef up.

Thank you for your time and consideration

Anitra Winkler

Proposal 62: Oppose
Proposal 69: Oppose
Proposal 74: Support

Proposal 63: Oppose
Proposal 71: Oppose

Proposal 64: Oppose
Proposal 72: Support

Proposal 66: Oppose
Proposal 73: Support



PC165

Submitted by: Thomas Wischer

Community of Residence: Kodiak, Alaska

Comment:

Proposals 62, 69-support

The Kodiak gill net fishery annual harvest has declined drastically for many years. We are a stationary/fixed gear fishery and are restricted to the central section of the Northwest Kodiak District. If we are to remain a viable fishery, we need time in the water without the competition of the seine fleet.

Proposal 63-support

Permit stacking would allow a family owned gill net site to fish all of their permits for the duration of the season. It should be amended to prohibit a stacked permit holder from fishing salmon in another region of the state.

Proposal 64-support

Having the option of using a longer hook or pot on a gill net may increase the individual permit holder's harvest and assist in getting closer to the historical set net harvest.

Proposal 66-Oppose

Increasing the length of a seine by 50 fathoms will increase the seine harvest to the detriment of gill net fishermen. Seine nets are already 50 fathoms longer than the regulation length of gill nets.

Proposal 70- support

Allocation attempts to achieve the historical harvest of Kodiak's gill net fleet.

Proposals 72,73 Oppose

These proposals would provide additional fishing opportunity for the seine fleet on the north and south adjacent sections to the only section where gill net fishing is permitted, resulting in only fewer fish available for harvest by an already diminished gill net fishery.

Proposal 74- Oppose

Dividing the Central Section into three sections that can be open or closed would concentrate the seine fleet in the open section(s) while the gill net fishermen in the closed section(s) would be denied fishing time further decreasing their harvest.

Proposal 62: Support	Proposal 63: Support With Amendments	Proposal 64: Support
Proposal 66: Oppose	Proposal 69: Support	Proposal 70: Support
Proposal 72: Oppose	Proposal 73: Oppose	Proposal 71: Support
		Proposal 74: Oppose



PC166

Submitted by: Garrett Wood

Community of Residence: Kodiak, AK

Comment:

My name is Garrett Wood and I own a seiner and tender boat in Kodiak. I also own a welding and fabricating business. I rely on healthy fisheries for all of my businesses. Before I even became a fisherman I worked as welder and earned all of my income from the fishing fleet. I care about this town and this community, and don't want to see changes to our fisheries management that would result in less fish being caught which means less money flowing to the businesses in town. Some of the proposals that intend to shut down the seine fleet in the central section would mean less fish across the docks and less income for all of the residents of Kodiak. Most of the fish that seiners would give up still will not be caught by setnetters, so basically no one would get to harvest those fish and less income will be available for our community. As a tender, I have seen how important this area is to the seine fleet and I know how bad it would be if the central section were arbitrarily closed to seining. Now that I also have a seiner, these proposals would harm me in three ways - less money available for my welding business, fewer days available for my tender vessel, and less fishing opportunity for my seine boat. I was able to start my welding business from scratch 12 years ago and I appreciate the opportunity that the fisheries in Kodiak provide for all of our residents and I hope the Board of Fisheries understands that this town runs on fish, so please don't take that away.

I support proposals 60 and 72 which would provide more fishing opportunity for seiners to access local stocks. I also support proposal 66, which would simplify net building for seiners.

I am very opposed to proposals 62 and 70. These proposals would harm all of my businesses and hurt the community of Kodiak.

I am opposed to proposal 65. As a tender, I have seen how flyers are used to spread out the fleet which benefits everyone.

I am also very opposed to proposal 68 which would mean that Karluk would drastically over-escape sockeye and waste fishing opportunity. I think the Alaska Department of Fish and Game should determine escapement goals and manage for those goals, not one individual with no scientific basis for the escapement numbers.

I support proposal 73. Of course we should include Sturgeon escapement goals in the management of the Sturgeon section,

Proposal 60: Support	Proposal 62: Oppose	Proposal 65: Oppose	Proposal 66: Support
Proposal 67: Oppose	Proposal 68: Oppose	Proposal 70: Oppose	Proposal 72: Support
Proposal 73: Support			



Submitted by: Stig Yngve

Community of Residence: Kodiak,AK

Comment:

See attached

Proposal 44: Support Proposal 45: Support With Amendments
Proposal 46: Support With Amendments Proposal 61: Support
Proposal 67: Support With Amendments Proposal 68: Support

I support proposal 51 with an amendment. I am the proposer. There are very few crab to catch for sport and subsistence harvest, king, tanner or Dungeness around Kodiak. I want to amend this proposal to read such that it would ban sportfishing for shellfish in Kodiak waters by any commercial sportfishing or transporting vessel outright.

I want to amend my proposal to only ban bait in freshwaters of the Kodiak remote zone. I support this proposal if it were to only include the Kodiak remote zone.

Proposal 44 is what I am talking about. I am the proposer and support it in full. This was also supported in an 11 to 3 vote by the Kodiak Advisory committee. It is sensible and needs to happen.

I am the proposer of this proposal 46 and support it with an amendment. When sockeye runs are at mid or upper end of escapement, legalized snagging of sockeye in freshwater should be allowed as a means of harvest.

I am the proposer of this proposal, Proposal . 67 I support it in its basic intent. I believe that the Coho specific number goals can be adjusted and are highly variable. I would like to see an RC, a register of change if possible on this one.

I worked for ADF&G on the Dog Salmon weir, the Karluk and the Ayakulik weirs, and other Kodiak Island weirs for the better part of 14 years. I am as qualified as any ADF&G biologist regarding salmon run strength estimation and enumeration. I am also a lifelong Alaskan that values these overlooked resources highly. I am also a recreational fisherman that spends an inordinate amount of my free time fishing and studying these 3 rivers (Karluk, Ayakulik, Dog Salmon) for myself. I also have previously and currently conduct guided sport fishing on all 3 of these drainages for the past 14 years as well.

My biggest concern here is the lack of concern for all anadromous fish species in Southwest Kodiak and Olga Bay, especially Coho, that ARE NOT high dollar commercial caught Sockeye or high volume, commercial dollar caught Pink salmon.

Alaska Department of Fish and Game Kodiak Island Commercial Salmon Management, under the reign of [REDACTED] and [REDACTED] has traditionally been quite vocal and blatant about their motives and intentions with salmon here. All that matters is Sockeye and Pinks. Their Westside salmon management plans and Alitak/Olga bay salmon management plans have consistently reflected that. Sportfish Management is almost completely absent from Coho in that part of the island. Sportfish has no funding or firepower to do much of anything. No weirs except Karluk operate past mid August.

My question is how can ADF&G manage anadromous fish stocks, Sockeye, Chinook, Pink, Chum, Dolly Varden, Coho, and Steelhead, commercially or otherwise, WITH FULL ACCOUNTABILITY, when there is no concrete quantitative data and fish counts to support management decisions after a weir is gone?

At the expense of Coho, commercial Sockeye and Pinks takes precedence. Coho are a huge part of fall sport fishing on Kodiak Island. Folks come from all over the state of Alaska to come to our Island to sport fish, also from all over the United States and from many different countries around the world as well. These rivers, Karluk ,Ayakulik, Sturgeon and Olga Bay Drainages are a tremendously valuable resource economically for approximately 20 fishing lodges from Uganik Bay to Olga Bay. This generates roughly the same income as a Salmon Seiner over the span of a season and it can't be done without COHO.

The monetary value is overshadowed on a much higher level by the natural demand for Coho. The whole ecosystem of the Karluk River, Sturgeon River, Ayakulik River, Akalura Creek, Upper Station Lakes, Dog Salmon River, Silver Salmon Lagoon and Horse Marine all depend on silvers heavily to feed Bears and foxes and provide nutrients for future salmon generations. Therefore, Coho are a natural phenomenon and to a lesser degree, economic phenomenon that needs to be addressed NOW.

The mouth of the Ayakulik River is narrow, less than 75 feet. Fish can stack up quite heavily at the outh of this river and like Karluk and Dog Salmon, the amount of Coho in this drainage is very small in comparison to Pinks(700,000-1,000,000 on a good year) and Sockeye(300,000-400,000) on a good year. ADF&G runs a weir on this river from late May to mid August most years. The weir has stayed in ONCE to count later running Coho in the last 25 years. It was 2009 and I was there counting them. There is no hard base line number for a minimum Coho escapement goal here. Generally the weir gets flooded out in August and that is it for the year. Commercial Salmon Seiners are left to fish wide open after the fact. Because the river mouth is so narrow. It literally takes 1 boat here blocking the river mouth or making repeated sets in its near vicinity to mop up everything .

There are 5 sportfishing operations on this river that make a partial or VAST MAJORITY of their income from Fall Fishing, of which Coho is the major part. I am one of them. That is a lot more than just 1 Salmon Seiner mopping up all the fish. Do it yourself unguided recreational fisherman come to fish this river from all over the world as well. Being that the Ayakulik is the longest drainage on the whole of Kodiak Island, its Coho are a crucial element for fueling the whole ecosystem from August to December. To recklessly and knowingly take away the lifeblood of a whole ecosystem for the better part of the fall is utterly foolish and caters selfishly to Salmon Seiners. Negligence and a dollar driven fishery rules here, NOT CONSERVATION AND SOUND ESCAPEMENT MANAGEMENT POLICY. In the past when a weir was gone, sonar was utilized to count fish with some degree of effectiveness, so it is possible to enumerate fish without a weir, but difficult to speciate properly. Bottom line, wide open commercial fishing without inriver enumeration is poor management and this needs to be remedied.

Regarding proposal 61 I support it in full.

I am the proposer of this proposal.

I worked for ADF&G on the Dog Salmon weir, the Karluk and the Ayakulik weirs, and other Kodiak Island weirs for the better part of 14 years. I am as qualified as any ADF&G biologist regarding salmon run strength estimation and enumeration. I am also a lifelong Alaskan that values these overlooked resources highly. I am also a recreational fisherman that spends an inordinate amount of my free time fishing and studying these 3 rivers (Karluk, Ayakulik, Dog Salmon) for myself. I also have previously and currently conduct guided sport fishing on all 3 of these drainages for the past 14 years as well.

My biggest concern here is the lack of concern for all anadromous fish species in Southwest Kodiak and Olga Bay, especially Coho, that ARE NOT high dollar commercial caught Sockeye or high volume, commercial dollar caught Pink salmon.

Alaska Department of Fish and Game Kodiak Island Commercial Salmon Management, under the reign of [REDACTED] and [REDACTED] has traditionally been quite vocal and blatant about their motives and intentions with salmon here. All that matters is Sockeye and Pinks. Their Westside salmon management plans and Alitak/Olga bay salmon management plans have consistently reflected that. Sportfish Management is almost completely absent from Coho in that part of the island. Sportfish has no funding or firepower to do much of anything. No weirs except Karluk operate past mid August.

My question is how can ADF&G manage anadromous fish stocks, Sockeye, Chinook, Pink, Chum, Dolly Varden, Coho, and Steelhead, commercially or otherwise, WITH FULL ACCOUNTABILITY, when there is no concrete quantitative data and fish counts to support management decisions after a weir is gone?

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The monetary value is overshadowed on a much higher level by the natural demand for Coho. The whole ecosystem of the Karluk River, Sturgeon River, Ayakulik River, Akalura Creek, Upper Station Lakes, Dog Salmon River, Silver Salmon Lagoon and Horse Marine all depend on silvers heavily to feed Bears and foxes and provide nutrients for future salmon generations. Therefore, Coho are a natural phenomenon and to a lesser degree, economic phenomenon that needs to be addressed NOW.

Dog Salmon Flats is very shallow, 1-4 feet deep and salmon stack up there and surge into the river with the incoming tide. The purpose of commercial salmon fishing the flats here in mid August is generally to mop up Pink Salmon and late Sockeye. Coho have virtually the same run timing here, as the 2nd half of the Pink Run, mid August



to mid September. By mid August the Sockeye run here is winding down as evidenced by ADF&G weir counts for the past 50 years or so. Thus the major money incentive salmon is almost non-present at all for the catching. Having restricted fishing here would have a minimal negative impact on the high dollar value Sockeye because the run is almost dried up at that time of year.

It only takes 1 set gill net here to utterly stop fish movement into the Dog Salmon River. There is no discriminating, everything gets caught. Simultaneous to the pink salmon run and end of Sockeye run is the Coho run. There are so few Coho, less than 3,000 on any given year, and upwards of 200,000 Pinks and 150,000 Sockeye, very very little money value generated by Coho from a commercial fishing perspective. This flats fishing literally benefits 1, **ONE** commercial salmon fishing enterprise, not a whole fleet of them. Thus there is no lost opportunity for a whole group of fisherman.

The weir on the Dog salmon is gone by mid August every year, so nothing gets counted. The ADF&G [REDACTED] Era Salmon management attitude is, "Well its over, so let 'em run wild (commercial fisherman that is) . I DON'T ABIDE BY THAT AT ALL in the name of Conservation. This river is a sport fishing gem as well as the lifeblood for close to 100 bears late in the Fall, with the Coho as a crucial food source. And it is completely overlooked. Fish and Game has a lack of management tools here to justify commercial fishing in the aforementioned manner after the weir is gone. IT NEEDS TO STOP.

I am the proposer of this proposal, Proposal 68. I support it in full

Stig comment please read out loud

Regarding proposal 68. I support this proposal in full.

I worked for ADF&G on the Dog Salmon weir, the Karluk and the Ayakulik weirs, and other Kodiak Island weirs for the better part of 14 years. I am as qualified as any ADF&G biologist regarding salmon run strength estimation and enumeration. I am also a lifelong Alaskan that values these overlooked resources highly. I am also a recreational fisherman that spends an inordinate amount of my free time fishing and studying these 3 rivers (Karluk, Ayakulik, Dog Salmon) for myself. I also have previously and currently conduct guided sport fishing on all 3 of these drainages for the past 14 years as well.

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Regarding Karluk River and its Sockeye, especially the Wild Stock late run, it is the largest commercial salmon fishery on Kodiak during August and September on years with a high volume of Sockeye and Pinks. Again, like the other systems, Karluk has SOCKEYE ESCAPEMENT and Sockeye DOLLAR driven motives managing and influencing it. It also has strong Pink runs as well. Normally Sockeye runs don't overlap much with Coho, but in this system, the late Sockeye Run coincides with the entirety of the Coho run. The Karluk is also a world renowned sport fishing river not only for Coho, but also for Sockeye, Steelhead and once upon a time, KINGS. It is one of the most studied rivers in the world in the last 200 years.

All species stage quite heavily in the Karluk Lagoon which is 4 miles long, and in the vicinity of the river mouth in the near shore waters of the Inner Karluk Section EVERY YEAR from early August to Late OCTOBER. Because everything lumps up in one big mass, untold thousands of steelhead, and 10s of thousands of Coho are caught every year by commercial Seine and gillnet while mainly targeting Sockeye and Pinks. Though the Coho carry small commercial monetary value, it is the Sockeye especially that draws commercial fisherman here late.

This drainage is also a salmoncentric ecosystem, very dependent on Coho and late Sockeye and Pink to fuel it with nutrients for all organisms. A single gray boat or a handful of seiners can singlehandedly control fish flow here too. It is even more vulnerable to overharvest of target and non target species than either Dog Salmon or Ayakulik because of the lagoon,/rivermouth area which at times can hold upwards of half a million salmon with the same amount or more in front of the lagoon in the ocean. Often times in September, the bulk of the whole Coho run is mixed in with those late Sockeye and Pinks.

In essence the whole Coho population can get scooped up swiftly in commercial nets in a matter of a day. This cannot happen. It is biologically blind and completely lacking in sensible management. Karluk is the one weir that is in operation latest, so species enumeration is realistically possible because of the weir being in operation to count late Sockeye. For far too long has Kodiak Salmon Management turned a blind eye to all species not named Sockeye and Pink. I demand accountability and I demand positive action.



PC168

Submitted by: Barbara Zimmerman

Community of Residence: Kodiak, AK

Comment:

I support the existing Kodiak Food and Bait Herring Fishery and do not support creating a new one.

Proposal 57: Oppose



PC169

Submitted by: David Zimmerman

Community of Residence: Kodiak, AK

Comment:

To whom it may concern,

I don't see the purpose of this proposal as we already have a food and bait herring fishery. Thank you.

Proposal 57: Oppose