

**Submitted by:** Russ Elliott

**Community of Residence:** Wasilla

**Comment:**

The Yukon River salmon population has been decimated by the salmon bycatch problem. Please stop salmon bycatch. We are losing an important resource both economically and socially

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**Submitted by:** Mark Engan

**Community of Residence:** Wasilla/Lake Louise

**Comment:**

89 - there is already too much fishing pressure on a lake Louise which has easy road access. Increasing the limit will certainly negatively impact the burbot population.

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November 24, 2024

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

Dear Board of Fisheries,

I am from Homer, Alaska, and I am writing to express my opposition to Proposal 78. My family has been part of the commercial fishing fleet for generations, and our land-based businesses have supported the hatcheries. We also sport fish and buy canned fish for our store. Economically, we've experienced both sides of the pendulum, and recently, we've been on the low end. We also have family members who are going through difficult times financially due to the lack of fish, which is impacting this very costly occupation. It is a poor decision to cut back on hatcheries when there are not enough fish to support our local fishing industry. With the challenges facing processors and the trawler industry also cutting back on the amount of salmon, this proposal would not be good for anyone.

Sincerely,  
Shelly Erickson

  
Homer, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I am from Homer, Alaska, and my family has been part of the commercial fishing fleet for generations. Our land-based businesses have supported the hatcheries, and we also sport fish and buy canned fish for our store. Economically, we've experienced both sides of the pendulum, and recently, we've been on the low end. We also have family members who are going through difficult times financially due to the lack of fish, which is impacting this very costly occupation. It is a poor decision to cut back on hatcheries when there are not enough fish to support our local fishing industry. With the challenges facing processors and the trawler industry also cutting back on the amount of salmon, this proposal would not be good for anyone.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.


**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong

foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,  
Shelly Erickson

  
Homer, Alaska

**Submitted by:** Ryan Erwin

**Community of Residence:** Anchorage

**Comment:**

I am Opposed to increasing the limit on Lake Louise to two Burbot.

1. Lake Louise has access to the road system which increases the amount of sportfishermen.
  2. Overfishing of Burbot.
  - 3, Technology such as the Garmin Panoptix increases allows sportfishermen and guides to effectively find/target Burbot.
  4. Lack of effective enforcement on the lake. We already see huts with unattended lines.
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**Märit Carlson-Van Dort, Chair**  
**Alaska Board of Fisheries**  
**Alaska Department of Fish and Game**  
**PO Box 115526 Juneau, AK 99811**  
**marit.carlson-vandort@alaska.gov**

11th of November 2024

Re: Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) Meeting Proposals

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

My family has called the PWS home since the late 70's and all 3 generations live and work in these waters. We care not only about the economic health of the fisheries, but in the overall health of the local marine environment as we navigate into a new generation of Alaskan resource management in the Post-Covid era, where all user groups are becoming more demanding of their fair share of our natural resources. Your thoughtful consideration of our comments relating to these proposals is very much appreciated.

Cheers,

Micah Ess and Family

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Proposals 1, 25, and 26 - OPPOSE

-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.

-Establish a personal use sablefish fishery in Prince William Sound.

-Establish a Prince William Sound groundfish personal use fishery

The unfished Sablefish GHL is largely the result of a short season where other higher priority fisheries take the attention away from landing sablefish. I have been unable to fish my C-Class sablefish permit for 2 years in a row because my fishing vessel is active in salmon fishing during the summer. We don't yet know how much excess GHL there will be remaining if we work to reduce the

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time and location restrictions that commercial pot fishermen in the PWS have had to work around. Once we step up the ability for the GHF to get harvested, then we might have the correct surplus data to make further management decisions,

#### Proposal 2 - SUPPORT

-Reopen waters closed to the harvest of groundfish in Prince William Sound

I don't think that the pot fishing closure area is something that is relevant anymore. We need to bring rockfish mortality down in the PWS and pot fishing is the remedy to that. The closed area is a large part of the sablefish habitat, and being able to target sablefish in this area without any rockfish bycatch is the key to keeping both stocks on track in the long run.

#### Proposal 3 - SUPPORT

-Modify Prince William Sound groundfish pot specifications

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

#### Proposal 5 - OPPOSE

-Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.

I am truly concerned for rockfish in the PWS, and the decline in stocks is tied to the uptrend of sportboat activity in PWS. The commercial harvest of rockfish in PWS has been happening in a consistent manner for over 60 years with very little change in biomass, and then starting 10 years ago stocks have been plummeting in correlation to the increase in sport and personal harvest. One commercial fishing vessel was solely responsible for a lion's share of the rockfish bycatch last year, and that was a sad misrepresentation of the commercial fleets' ethics to minimize rockfish bycatch as a whole.

#### Proposal 6 - SUPPORT

-Allow for release of rockfish in mechanical jig and hand troll fisheries.

I would love to be able to innovate on ways to more effectively return rockfish to the bottom that are suffering from barotrauma. Rockfish by-catch is not something anyone wants, and being able to clip them into a drop station immediately would be something I'd love to be able to implement, improve, and build equipment for.

#### Proposal 19 - SUPPORT

-Modify the commercial fishing season for sablefish in Prince William Sound.

We need more time to harvest sablefish in the PWS, I think everyone agrees on this. I am a very small-time family fisherman, and this fishery is one of the ways I can get my young daughters out on the boat with me and fish with them. I need September to be inside the sablefish season so that I can wrap up salmon fishing and start my family sablefish trip.

#### Proposal 22- SUPPORT

-Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed. Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

#### Proposal 56 - SUPPORT

-Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders.

Permit stacking has now been implemented in Alaska fisheries with good results which I believe we will also benefit from. The reality of our drift fishery is that outside of a couple big openers, it's simply months of scratching up a living. Outside of hatchery clean-ups, there are times when a fisherman struggles to find enough biomass to even set the gear. Having the opportunity to extend the length of the gillnet for full time fishermen who rely on fishing would keep this fishery alive at a time where overhead is at an all time high. These "D" boats would most likely be employing crew, which helps get money deeper into the local economy, and they would be effective in helping manage escapement of wild run sockeye during July when the fleet is small and ineffective in the Copper River District. Currently we are unable to harvest our allocation of salmon on the Copper River during its late season because the lion's share of the fleet moves out of the area to the PWS. Permit stacking would also allow fishermen to feel more confident targeting dispersed offshore biomass rather than nearshore, potentially reducing effort in areas that are being fish heavily, and possibly where king salmon are transiting.



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I believe permit stacking also increases better matriculation of people into the fishery by allowing crew to be permit holders and retain a higher percentage of the vessels revenue, which should help in saving for one's own vessel. I support full permit stacking over dual-permit operation because some vessels are small and don't support the room for crew/permit holders. I don't feel like an extra shackle will change the nature of the fishery much in terms of competition, and with an estimated 15% adoption rate I think this proposal gives professional fishermen the ability to maintain the revenue they need to sustain the local economy while reducing the amount of gear that is being fished. It's a win-win.

#### Proposal 57 - SUPPORT

-Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery.

Although I would rather see Proposal 56 pass because it provides more latitude in our smaller fleet for any vessel to take the leap into being a "D" boat, rather than just bigger boats with larger cabins for permit holders and crew. Dual permit holder regulations create an environment where fishermen game the system and place permits in other peoples names. It doesn't really have a great legacy in Alaska, but I support it over not having any type of Gear Consolidation at all.

#### Proposal 58 - OPPOSE

-Amend the Copper River King Salmon Management Plan.

With statewide concerns for king salmon, this is not a time to consider raising limits. Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

#### Proposal 59 - OPPOSE

-Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.

This proposal is a reallocation of a resource that is already at its allocation limit. Personal use dip netting is not species-discriminative. Passing this proposal will mean a more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known.

**Submitted by:** Francis Estalilla

**Community of Residence:** Aberdeen WA

**Comment:**

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the destructive and unsustainable commercial PWS pollock trawl fishery as specified in Proposals 14 and 16. If the Board fails to pass either of these Proposals, I would highly encourage them to consider measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.

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**Submitted by:** Salvador Estrada

**Community of Residence:** Eagle River

**Comment:**

I would like to express my support for charter access and dipnetting for this particular personal use fishery. Over the past 3 years, my family has come to rely on these fish and the charters that provide us access to them, along with the current and appropriate limits that provide a substantial portion of food for my family. In my opinion, commercial fishing organizations threaten Alaskan residents food security by destroying ecosystems for out-of-state interests, while local charter operators provide access to normal, everyday Alaskans that don't own boats and rely on dipnetting and dipnet charters to fill our freezers and appreciate and value our resources. Our fish, our food resources, are simply assigned a monetary value by commercial fishing organizations. To local charters and real Alaskans, those fish are our food and our resource, thank you.

Oppose: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72

Support: 48, 58, 59, 70

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fisherman.

Since 1988, I have been involved in Prince William Sound and Copper River area fisheries.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

W Evans

[REDACTED]

Spenard, alaska

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:**

SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU



**Submitted by:** Jake Everich

**Community of Residence:** Kodiak

**Comment:**

Hello Board of Fish Members,

My name is Jake Everich, I'm the owner/operator of the F/V Alaskan. Built in 1967 as a King Crabber, and converted to trawling in the mid 1980s - she is one of the oldest Alaskan-owned trawl vessels. Its former owner, Jay Stinson, pioneered the PWS pollock trawl fishery.

The fishery has a large economic importance to the Kodiak trawl fleet, and has a proven track record of environmental stewardship and effective bycatch management.

Don't eliminate an entire fishery based on false propaganda and emotional antics.

Best,

Jake Everich

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RE: Proposals 14-17 (PWS pollock fishery). SUPPORT PROPOSAL 16

Board members, thank you for the effort, consideration, and time you volunteer to advance the sustainable management of our fishery resources.

The board needs to close the *Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan* (5 AAC 28.263). If you rescind this fishery, you will actually improve the overall management:

1. Closure WILL NOT result in unharvested pollock;
2. Closure WILL result in better observer coverage;
3. Closure WILL result in better accountability for existing Chinook salmon bycatch limits;

I'll discuss these three very important points later, but first I have to bring to your attention to the fact that the PWS "pelagic trawl" fishery is certainly not operating within the board's own definition of a pelagic trawl (5 AAC 39.105 (d)(10)(C)).

In the ADF&G comments on proposals 14-17, in the section, "WHAT ARE THE CURRENT REGULATIONS", the department seems to make a big omission and there's no mention of the state's actual definition of pelagic trawl – established by the board – in 5 AAC 39.105 (d)(10)(C), (my emphasis added):

- (10) a trawl is a bag-shaped net towed through the water to capture fish or shellfish;
  - (A) a beam trawl is a trawl with a fixed net opening utilizing a wood or metal beam;
  - (B) an otter trawl is a trawl with a net opening controlled by devices commonly called otter doors;
  - (C) *a pelagic trawl is a trawl where the net, or the trawl doors or other trawl-spreading device, **do not operate in contact with the seabed**, and which does not have attached to it any protective device, such as chafing gear, rollers, or bobbins, that would make it suitable for fishing in contact with the seabed;*

I use quotes around the term "pelagic trawl" here because it is not pelagic (or midwater) to any verifiable degree. This gear type makes anywhere from occasional to frequent contact with the seafloor while being fished and there isn't currently any verifiable and enforceable way to ensure that it isn't being fished on the bottom.

## **THE BIG LIE**

The pollock industry has for the past several decades touted their environmentally-friendly mid-water (or pelagic) trawl gear, often saying it doesn't contact the seafloor in their public relations materials. However, in the last few years, the public has become aware that "pelagic trawl" gear is being fished in contact with the bottom with varying regularity and – and in some cases up to 100% of the time. Attached to this public comment is *The Myth of "Mid-water" in the*

*Alaska Pollock Fishery*<sup>1</sup>, an excellent compilation of the available information by Michelle Stratton and Marissa Wilson with the Alaska Marine Conservation Council. I strongly encourage you to review this attachment.

Pollock industry representatives have even admitted recently that this has been their dirty little secret. From Laine Welch's reporting<sup>2</sup> and comments made by industry representatives during Governor Dunleavy's Bycatch Task Force:

It is the first time the amount of bottom contact by mid-water (pelagic) trawl gear has been put in writing. But former NPFMC chair, Stephanie Madsen, admitted that it is an uncomfortable fact that many have known about (and brushed under the rug) for decades.

"It is an estimate" and "not proven."

"It has been know all along by many."

STEPHANIE MADSEN, AK BYCATCH TASK FORCE MEMBER, DIRECTOR OF AT-SEA PROCESSORS ASSOCIATION, FORMER NPFMC CHAIR RAISING EYEBROWS  
AT A NOV. 7, 2022 BYCATCH TASK FORCE MEETING.

Wait, what?

I appreciate the concern brought forward by the authors of the other proposals, and the thought they put into ways to improve this fishery, but the best solution would be for the board adopt proposal 16 and close this state-waters fishery and let the pollock quota revert back to the federal fishery where it can be harvested as part of the federally-managed fishery in the Gulf of Alaska (GOA). The participants in the PWS pollock fishery are the same participants in the broader, federally-managed GOA pollock fishery. Closure of the state-waters PWS fishery should have minimal impacts on the fishery participants, while resulting in better overall management, at least for the near-term future.

<sup>1</sup> [https://www.akmarine.org/files/ugd/284c1f\\_e3e23a16ac934ec7ac6752ce4c1939cb.pdf](https://www.akmarine.org/files/ugd/284c1f_e3e23a16ac934ec7ac6752ce4c1939cb.pdf)

<sup>2</sup> <https://alaskafish.news/06/2023/the-myth-of-mid-water-in-the-alaska-pollock-fishery/>

### **1. Closure of the PWS fishery WILL NOT result in unharvested pollock.**

The state doesn't directly assess the pollock stock in the GOA, nor in PWS, and instead relies on the federal management process that assesses and establishes the federal Allowable Biological Catch (ABC) and Total Allowable Catch (TAC). When the PWS fishery was established, the state essentially allocated itself 2.5% of the annual pollock ABC as determined by the feds in the Western/Central/West Yakutat Gulf of Alaska. In order to remain below the federally-determined ABC, the feds need to deduct the state fishery allocation from the ABC before then establishing the TAC for the federally-managed fishery. This deduction is done every year in the NOAA Fisheries Stock Assessment and Fishery Evaluation (SAFE) Report<sup>3</sup>.

If the board closes the PWS fishery, the feds won't have to deduct the PWS allocation and it will be available to be harvested in the federally-managed fishery elsewhere in the GOA. Additionally, none of the catch in the PWS fishery gets delivered in PWS communities; it all goes back to processing plants in Kodiak. If the PWS pollock allocation reverts back into the federal fishery ABC/TAC, they can still take it elsewhere in the GOA and deliver it to Kodiak.

### **2. It will result in better observer coverage.**

While it's unfortunate that the federally-managed pollock trawl fisheries in the GOA don't require full onboard observer coverage (it is 33% coverage, I believe), the state-managed PWS "pelagic trawl" pollock fishery requires **ZERO** onboard observer coverage. The board can vastly improve the observer coverage for how this tonnage of pollock is harvested by closing the PWS fishery and allow the pollock to be taken under the better observer requirements in the federal fishery.

In the department comments on proposal 17 (which asks the board to require observers in this fishery), the department states that they have "the authority but not the resources to deploy onboard observers in the walleye pollock fishery" and further points out that the board does not have the authority to require electronic observation methods.

**Ending the PWS state-waters pollock fishery puts the same harvest quota back into the federally-managed fisheries where better observer coverage is currently required.**

### **3. It will result in better accountability for Chinook salmon bycatch.**

The federally managed pollock fishery in the GOA operates under area-specific hard caps: 18,316 Chinook salmon in the Central Gulf of Alaska and 6,683 Chinook salmon in the Western Gulf of Alaska<sup>4</sup>. But the Chinook salmon bycatch in the state-managed PWS fishery does not count against this federal limit. As stated above, if the board closes the PWS pollock fishery, the pollock allocation reverts to the federal fishery, thus ensuring that all Chinook salmon bycatch that occurs while catching GOA pollock will apply to the federal Chinook salmon bycatch limit.

<sup>3</sup> The deduction for the PWS fishery can be seen in Appendix table 1D.3 on page 106 of the 2023 SAFE Report for GOA pollock at [https://apps-afsc.fisheries.noaa.gov/Plan\\_Team/2023/GOApollock.pdf](https://apps-afsc.fisheries.noaa.gov/Plan_Team/2023/GOApollock.pdf)

<sup>4</sup> <https://www.npfmc.org/fisheries-issues/bycatch/salmon-bycatch/>

The state fishery in PWS basically allows the GOA pollock trawl fleet to exempt their Chinook salmon bycatch in the PWS pollock fishery from their federal GOA Chinook trawl bycatch limits.

### **SUMMARY**

As pointed out above, closure of the PWS “pelagic trawl” pollock fishery will have minimal impacts on the fishery participants...aside from requiring somewhat better observer coverage and better accountability for Chinook salmon bycatch. The federal management system, via the North Pacific Fishery Management Council (Council), is undertaking a process that will hopefully more accurately account for bottom contact by pelagic trawl gear and reduce (or eliminate) impacts on seafloor habitat and unaccounted mortality on benthic creatures like crab.

The Council process is iterative and thorough, but it’s anything but speedy and responsive to immediate needs. It’s also dominated by trawl interests, so I remain skeptical (until proven otherwise) of how effective their outcomes may be.

As board members, you should proceed with maximum caution and consider the potentially significant and recent concerns about the unknown but confirmed impacts of “pelagic trawl” gear on seafloor habitat and organisms. This is especially true in light of your existing regulations that state no part of a pelagic trawl can operate in contact with the seafloor.

It also remains to be seen if the Alaska legislature will grant the board and department the authority to require electronic monitoring measures to more efficiently monitor fishery impacts without the need for onboard observers.

I hate to say it but [for now] the Council seems the best place to let these issues settle out regarding pelagic trawl, even though that may take some time. Close the PWS fishery now and see how the Council process plays out. If – in the future – the board feels comfortable with outcomes from the Council process, a future board can consider reestablishing this fishery with that new guidance.

Respectfully,  
Grant Fairbanks  
Bethel, Alaska



## **The Myth of “Mid-water” in the Alaska Pollock Fishery**

Michelle Stratton, Fisheries Scientist and Marissa Wilson, Executive Director  
Alaska Marine Conservation Council

### **Introduction**

The Alaska Marine Conservation Council is dedicated to protecting the long-term health of Alaska’s marine ecosystems which sustain vibrant fishery-dependent communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems.

Fisheries management in Alaska is often referred to as the “gold star” standard. Sustainability is written into Alaska’s constitution, and the identity of its diverse and productive fisheries. But how sound is this designation? This paper discusses current policies and practices within the Alaska Pollock Fishery, with focus on trawl gear contact with the seafloor. Government, industry and certification institutions have consistently described pelagic trawl gear as fished off the bottom, or “mid-water”, with minimal or no interaction with seafloor habitat and benthic animals. Analysis recently highlighted at the North Pacific Fisheries Management Council, however, indicates that this fishery — the largest food fishery on the planet — contacts the seafloor on average from 40% to 80% of the time, with rates up to 100% on factory ships. Parallel to this, iconic species in dramatic decline in the Bering Sea indicate a broader benthic collapse. Considering the footprint of the pollock fishery, and decades of unmitigated seafloor contact, it is likely that long-term damage to sensitive habitat and benthic organisms are contributing drivers of ecosystem degradation. Such impacts and their potential solutions, however, are currently underrepresented in analysis, due in part to the assignment of arbitrary recovery and susceptibility rates. The combined impact of unassessed contact and inaccurate recovery metrics imply significant consequences for essential habitat and other critical components of biodiversity and climate resilience. Individual species suffering from significant declines — while often framed as isolated climate casualties — are ecosystem stress indicators showing that status quo approaches to habitat protections and ecosystem interactions are insufficient. With an expanded understanding of the scope of mobile gear contact with the seafloor, there is a need for ecosystem-wide assessment of the consequences of historic and ongoing behavior, enforced minimization of impacts to benthic ecosystems, and greater sophistication of assessment and monitoring.

## Gear Definition

Over the years many documented statements have claimed that pelagic trawl (PTR) gear is fished off the bottom, or is “mid-water” i.e.:

- **Fishwatch**<sup>1</sup> U.S. Seafood Facts Wild Caught FAQs: Fishing methods vary in scale and operation depending on species and area being fished. For example fishermen tow large trawl nets through the water column to harvest schools of Alaska pollock.
- **At-Sea Processors Association**<sup>2</sup> *The Alaska Pollock Fishery A Case Study of Successful Fisheries Management*: Pollock vessels tow cone-shaped, mid-water trawl nets to harvest the resource. Pollock swim in large schools above the ocean floor. The fishing nets do not drag along the ocean bottom. In fact, federal regulations prohibit “bottom trawling” for pollock.
- **At-Sea Processors Association**<sup>3</sup> *Avoiding Incidental Catch of Non-Pollock Species*: Pollock aggregate in enormous schools and are harvested using “midwater” trawl nets that are not dragged along the ocean floor. As a result, the pollock fishery is a very “clean” fishery, that is, non-pollock species account for about 1% of the catch.
- **Midwater Trawl Cooperative**<sup>4</sup> *Let’s Talk Trawling*: Our member vessels pull conical nets either in the middle of the water column (midwater) or closer to the bottom – depending upon the species targeted.
- **NOAA Fisheries**<sup>5</sup> *Fishing Gear Midwater Trawls*: Midwater trawling is a fishing practice that herds and captures the target species by towing a net through the water column.
- **Marine Stewardship Council**<sup>6</sup> *Pelagic Trawl*: Pelagic trawls are generally much larger than bottom trawls. They are designed to target fish in the mid- and surface water. Midwater trawls have no contact with the seabed.

Understanding the discrepancy between these statements and recent analysis from the North Pacific Fishery Management Council (NPFMC), which indicates that pelagic gear can be in contact with the seafloor *upwards of 100% of the time during tows*, is best illuminated by studying history.

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<sup>1</sup><https://www.fishwatch.gov/sustainable-seafood/faqs>

<sup>2</sup><https://static1.squarespace.com/static/5a625f328a02c7a950486d60/t/5aa08aa54192022702834a0c/1520470698279/pollock+fishery+description.pdf>

<sup>3</sup><https://www.google.com/url?q=https://www.atsea.org/read-more&sa=D&source=docs&ust=1673567071249009&usg=AOvVaw1qxJxPfNOQCx54KQEJ4zSV>

<sup>4</sup> <https://www.midwatertrawlers.org/category/issues/>

<sup>5</sup> <https://www.fisheries.noaa.gov/national/bycatch/fishing-gear-midwater-trawls>

<sup>6</sup> <https://www.msc.org/what-we-are-doing/our-approach/fishing-methods-and-gear-types/pelagic-trawls>



A “performance standard” for PTR gear was developed to determine adherence to the intent of the gear definition<sup>7</sup>. The definition of “pelagic trawl”, which differentiates the gear from “non-pelagic trawl” (NPT) or *bottom trawl* (a gear type which is generally prohibited from use for the BSAI pollock fishery<sup>8</sup>), has changed in recent decades in response to restrictions in the catch of prohibited species, and currently rests upon a performance standard which prohibits having more than 20 crab (described also as infauna<sup>9</sup>) on board at any one time. The regulation states that “crabs were chosen for the standard because they inhabit the seabed and, if caught with trawl gear, indicate that the trawl has been in contact with the bottom.” The Stock Author refers to this in the 2023 Essential Fish Habitat review:

Presently the fishery is closely monitored for bottom contact by the mandatory pelagic trawls. If bottom contact were to increase substantially (based on infauna within sets) then this should be evaluated further<sup>10</sup>.

When reviewing the gear itself, however, it becomes apparent that **crab catch is not a suitable standard for determining bottom contact**. In fact, prior to implementation of this performance standard, *the definition of pelagic trawl gear once explicitly referenced bottom contact*. Before a regulatory change in 1990, the definition of pelagic trawl was as follows:

Pelagic trawl means a trawl on which neither the net nor the trawl doors (or other trawl-spreading device) operates in contact with the seabed, and which does not have attached to it protective devices, such as rollers or bobbins, that would make it suitable for fishing in contact with the seabed<sup>11</sup>.

Amidst extensive consideration by the NPFMC of measures to conserve crab and halibut at a point when those species were experiencing drastic declines, changes were made to the definition of PTR. This included removing references to seabed contact and adding a panel of wide meshes, presumably to avoid restrictions resulting from Prohibited Species Catch (PSC) encounters that the NPT fleet was likely to realize (emphasis added):

*Prohibitions on parts of the pelagic trawl contacting the bottom that are part of the current definition are not enforceable and therefore should not be part of the pelagic trawl gear definition.* Rather, pelagic trawl gear should be defined to reflect the way it is fished. Pelagic trawl gear is not fished on the bottom, *but may contact the bottom* at

<sup>7</sup> [Fisheries of the Exclusive Economic Zone Off Alaska: Prohibition of Nonpelagic Trawl Gear in the Bering Sea and Aleutian Islands Pollock Fishery](#)

<sup>8</sup> § 679.24 Gear limitations. (4) BSAI pollock non pelagic trawl prohibition. No person may use non pelagic trawl gear to engage in directed fishing for non-CDQ pollock in the BSAI.

<sup>9</sup> [Invertebrates living within the matrix of aquatic sediments and including small crustaceans..](#)

<sup>10</sup> [Evaluation of Fishing Effects on Essential Fish Habitat January 2023](#)

<sup>11</sup> [EA/RIR/Initial Regulatory Flexibility Analysis for Revised Amendment 21 to the FMP for Groundfish of the GOA and Revised Amendment 16 to the FMP for Groundfish of the Bering Sea/Aleutian Islands](#)



times. The above restrictions [note: the definition referenced above] about parts of the trawl not contacting the seabed were intended to minimize the bycatches of halibut and crab. Ideally, however, trawl gear definitions should allow for maximum groundfish catches while catching minimal prohibited species catches (PSC) of halibut and crab<sup>11</sup>.

Subsequently, the definition was expanded to incorporate meshes of 64 inches which allowed for prohibited species catch to fall through the first portion of the net. A comment letter from this action in 1990 states directly that “because a pelagic trawl is commonly fished in frequent contact with the seabed, the larger mesh size is intended to enhance release of halibut and crab if captured<sup>12</sup>.” At this time in NPFMC proceedings, analysis makes no mention of “unobserved mortality,” or mortality resulting from fishing effort that cannot be accounted for in hauls that come aboard, such as crab that are crushed under the weight of mobile trawl gear.

A recent document from the NPFMC on Salmon Bycatch Frequently Asked Questions describes the current configuration of PTR nets (*emphasis added*):

Pelagic trawls are constructed to achieve large openings with minimum drag, and herd pollock into the back of the net (codend) where they are captured. Pelagic trawls typically have an opening of 160-400’ wide by 40-100’ high depending on the horsepower of the vessel. *Mesh size of a pelagic trawl can be 100’ at the opening, progressively getting smaller towards the codend*<sup>13</sup>

Local knowledge of pollock behavior is helpful to illuminate how this gear functions in action: while pollock generally live above the seafloor (“at least for a significant period during early life and spawning<sup>8</sup>”), pollock are known by fishermen to be on the seafloor at night and slightly above the seafloor during the day, with Pacific cod in an inverse relationship. Pollock are also known to dive in response to threats. Pollock behavior incentivizes use of PTR gear on the seafloor. Indeed, this was described explicitly in 1990 when the definition of PTR was slated for revision. For any infauna such as crab - which cannot move quickly to avoid the net or swim away - that manages to pass over the footrope (Figure 1)<sup>14</sup> and might get caught in the opening of the net, it is virtually guaranteed to fall out of the first series of meshes.

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<sup>12</sup>[Federal Register: 56 Fed Reg. 2665 \(January 24, 1991\)](#)

<sup>13</sup>[Salmon Bycatch Frequently Asked Questions](#)

<sup>14</sup>[Red King Crab Savings Area December 2022](#)

C1 RKC Savings Area  
December 2022

### Pelagic Trawl Gear

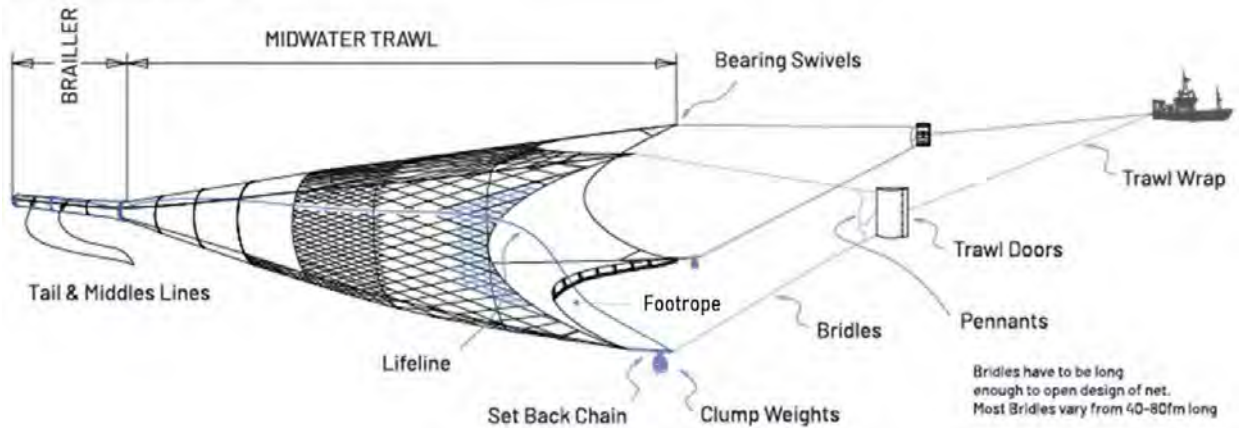


Figure 1. Example of pelagic trawl gear configuration.

Currently, the legal definition of PTR gear actively prohibits meshes smaller than 20 inches between knots in the forward part of the net, and 15 inches between knots in the aft part of the net<sup>15</sup>. The Bering Sea Aleutian Island Fishery Management Plan (FMP) for groundfish confirms this intent by describing the capacity for animals to swim *into and out of* the net from the seafloor, but fails to consider the intent of this gear modification with regards to reducing harm to PSC such as crab:

These nets have a large enough mesh size in the forward sections that few, if any, benthic organisms that actively swim upward would be retained in the net. Thus, benthic animals that were found in other studies to be separated from the bottom and removed by trawls with small-diameter footropes would be returned to the seafloor immediately by the Alaska pelagic trawls<sup>16</sup>.

The FMP continues to describe benthic interactions, characterizing the use of large mesh size as a mechanism for reducing impacts to large living organisms that provide habitat, but also describes the leveling effect of the net (*emphasis added*):

<sup>15</sup> [Federal Register](#)

<sup>16</sup> [FMP for Groundfish of the BSIA Management Area](#)

Sessile<sup>17</sup> organisms that create structural habitat may be uprooted or pass under pelagic trawl footropes, while those that are more mobile or attached to light substrates may pass over the footrope, with less resulting damage. Non-living structures may be more affected by pelagic trawl footropes than by bottom trawl footropes because of the *continuous contact and smaller, more concentrated, surfaces over which weight and towing force are applied*. In contrast, bottom trawls may capture and remove more of the large organisms that provide structural habitat than pelagic trawls because of their smaller mesh sizes. The bottom trawl doors and footropes could add complexity to sedimentary bedforms as mentioned previously, while *pelagic trawls have an almost entirely smoothing effect*.

Crab catch is a drastically insufficient means of assessing bottom contact due largely to gear design. Even though the design is purported to benefit species like crab by allowing them to fall through the meshes, it is clear that the gear has a leveling effect. While PTR gear is distinguished from NPT gear *in regulation*, it is known that *in practice* both have substantial bottom contact - with PTR absent mitigation measures that address its impact.

## Benthic Impacts

Unlike NPT gear, PTR gear does not have any gear modifications, such as rollers or bobbins, to prevent damage to benthic habitat and infauna. We focus this section first on crab, as a commercially valuable species with relatively considerable study as a representative of infauna health; the latter section will focus on benthic habitat more broadly, with emphasis on a slow-growing octocoral and its consideration within Essential Fish Habitat reviews.

As described previously, the absence of rollers and bobbins was originally intended to disincentivize PTR seafloor contact. Despite a performance standard that would indicate this has been a success for vulnerable species like crab, the NPFMC has recently documented rates that have alarmed fisheries participants, particularly those affected by the collapses of snow crab and red king crab in the Bering Sea, to the point of soliciting emergency action. These contact rates also call into focus the need for gear modification if the gear continues to be fished how and where it currently is.

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<sup>17</sup> Permanently attached or established: not free to move about; [merriam-webster.com/dictionary/sessile](https://www.merriam-webster.com/dictionary/sessile)

The estimated bottom contact values from the NPFMC's February 2022 Effects of Fishing on Essential Fish Habitat (EFH) Discussion Paper<sup>18</sup> for the pelagic pollock fleet is as follows:

Vessel Type	Season	Contact Adjustment (Low)	Contact Adjustment (High)
<b>Bering Sea Pelagic Pollock Trawl</b>			
Catcher Vessels	A <sup>19</sup>	20%	60%
Catcher Vessels	B <sup>20</sup>	20%	60%
Catcher Processors	A	70%	90%
Catcher Processors	B	80%	100%
<b>Gulf of Alaska Pelagic Pollock Trawl</b>			
Catcher Vessels		0%	40%

While there is opportunity to further explore the reasons for variance in these rates so that best practices can be realized, we can turn again to recognized pollock behavior to understand likely explanations for the differences: Catcher Processors have the capacity to operate both day and night, using vessels and gear that have a greater capacity for wear and tear; and pollock behavior varies between the Bering Sea and Gulf of Alaska (GOA), for reasons that may include habitat variation and life stages. However, observer rates in the GOA are just 23%, leaving room to question the accuracy of those values<sup>18</sup>.

To corroborate evidence of PTR contact with the seafloor, the NPFMC December 2022 Red King Crab Savings Area<sup>21</sup> discussion paper reported the rate of metal pots used in other fisheries that were caught with PTR gear in the Red King Crab Savings Area (RKCSA) over the past 10 years. Observer data shows that 9-21% of PTR tows in the Catcher Processor (CP) sector and 0-21% of tows in the Catcher Vessel (CV) sector intercepted pot gear, which sits on the seafloor when deployed. Comparatively, the rates for NPT gear ranged from 2-12% of tows in the CP

<sup>18</sup> [Effects of Fishing on EFH February 2022](#)

<sup>19</sup> January to June

<sup>20</sup> June to October

<sup>21</sup> [Considering a Closure to the Red King Crab Savings Area for all Gear Types December 2022](#)

sector and an annual average of 0% of tows in the CV sector. On average, 1 out of every 11 PTR tows captures at least one pot, a rate that is greater than NPT pot captures rates.

The RKCSA was designed to protect an area known to be consistently important for red king crab, especially during molting and mating, by excluding NPT - recognizing that mobile gear damages crab and their habitat. In 2022, an emergency action was sought by red king crab fishery participants to close the RKCSA to all gear types for the 2023 molting and mating season, citing the need to conserve the remaining population of crab and the recognized importance of that area for crab. This request was ultimately not recommended for adoption by the NPFMC and denied by the National Marine Fisheries Service due in large part to the regulatory definition of an emergency, suggesting that a consistent decline in red king crab abundance does not constitute an unforeseen event and therefore is not viable for emergency action.

Both within and outside of the RKCSA, a consistent pattern of PTR bottom contact presents a significant, and virtually unaddressed, management concern. We have attached figures specific to pelagic trawl habitat disturbance, including within the RKCSA, that we believe should be considered (Figure 1 and 2) to protect species that have declined to the point where directed fisheries are closed, even if stocks do not have protected status under the Endangered Species Act.

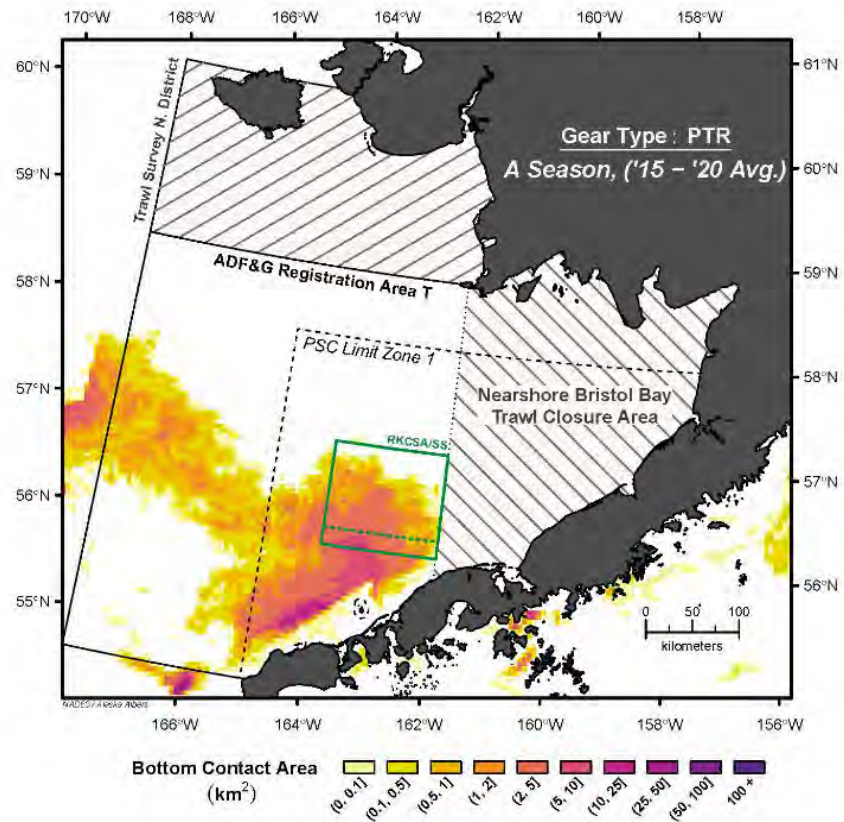


Figure 1 Pelagic trawl average bottom contact area 2015-2020 during A season which includes when crab are molting (soft-shelled) and mating (Source APU FAST Lab).



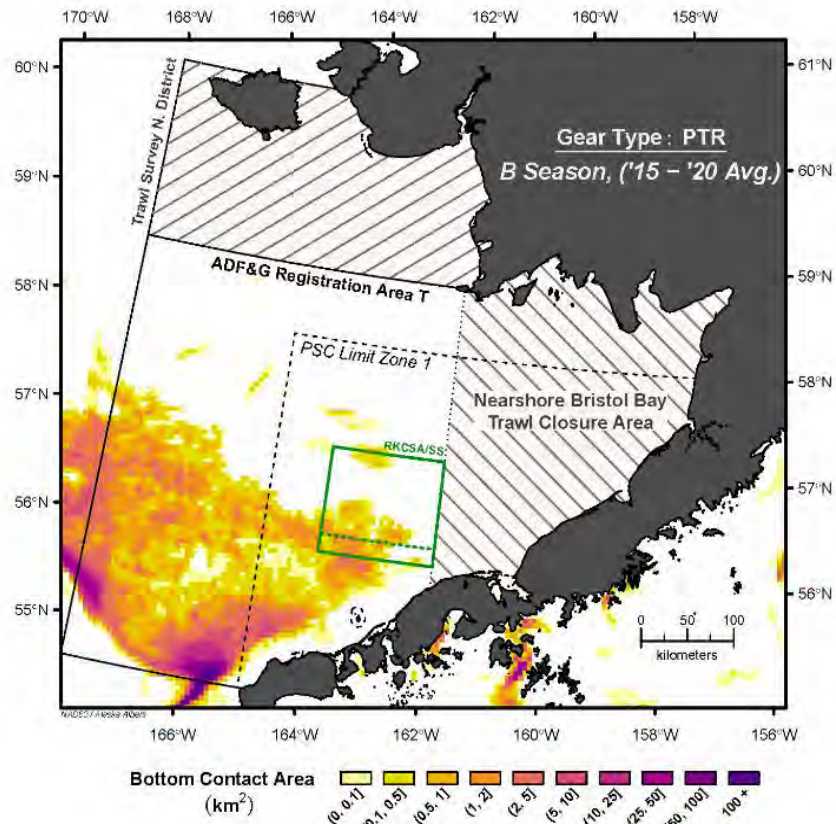


Figure 2 Pelagic trawl average bottom contact area 2015-2020 during B season (Source APU FAST Lab).

Consequences of PTR bottom contact include mortality of crab that is unaccounted for, and this has been the case since the PTR definition was revised in response to crab crashes more than thirty years ago. Some, if not most, crab mortality is not observable and is not currently reported directly in mortality rates which inform stock assessments, though it is known that not all crabs that encounter trawl gear are captured or avoided<sup>22</sup>. Crab can be injured or killed by contact with any section of trawl gear: doors, sweeps, footropes (thick steel chains or cables), footrope gear and net. Aside from contact, they can also be affected by the silt cloud stirred up by trawl gear dragging across the ocean floor. Rose et. al 2012 provided a limited study of unobserved mortality of tanner, snow, and red king crabs from interaction with bottom trawl gear. Recapture nets were used to retain crab that interacted with the gear but did not end up in the primary net. They found that mortality rates of tanner and snow crab ranged from 4%-15%, and red king crab mortality rates ranging from 9% to 32%<sup>23</sup>. It could be estimated that

<sup>22</sup> [Crab Bycatch in the Bering Sea/Aleutian Islands Fisheries June 2010](#)

<sup>23</sup> [Quantification and reduction of unobserved mortality rates for snow, southern Tanner, and red king crabs \(\*Chionoecetes opilio\*, \*C. bairdi\*, and \*Paralithodes camtschaticus\*\) after encounters with trawls on the seafloor](#)

those rates could be higher for pelagic trawl nets considering their lack of contact mitigation gear, and the substantial “smoothing” capacity of the steel footrope. Regardless, this demonstrates confidence in a range of statistically significant numbers that could and should be associated with unobserved crab mortality by pelagic trawl gear. **However, the current rate of unobserved mortality accounted for in crab stock assessments and considered in pelagic trawl management standards is 0<sup>24</sup>.**

In 2009, NPFMC added a gear modification requirement to NPT in order to raise sweeps off the bottom and reduce negative impacts to benthic animals. This gear modification reduced the mortality rates of crab for the NPT fleet and further reduced their benthic habitat impact. No gear modifications were mandated for the pelagic fleet due to the assumption of mid-water fishing resulting from the PTR performance standard. The pelagic trawl fleet continues to function without these mitigation measures, despite compelling documentation of duration and impact of seafloor contact. Consequences of the continued downward trend of crab stocks and subsequent fishery closures affect crab fishermen and crew, their communities and communities adjacent to that fishery that provide processing services.

**We are concerned that red king crab and snow crab, both in dramatic decline in the Bering Sea, may be indicator species of broader benthic collapse resulting from human activity.**

Infauna are considered to be engineers of the seafloor, and besides crab includes bivalves and marine worms, all of which are important for nutrient exchange and essential cycles of sediment stabilization and destabilization. In addition to infauna, benthic habitat in the Bering Sea also includes slow-growing octocorals, sponges and more; categorized most broadly as megafauna (analogous to trees on land) and macrofauna (analogous to weeds<sup>25</sup>). These species provide greater ecosystem benefits than protective shelter alone, including: medicinal nutrients when consumed, which is increasingly important for species at greater risk of disease with changing water temperatures; and biogeochemical cycling, or pathways by which matter is circulated, which contributes to benthic-pelagic coupling - considered a distinct biological feature of the Bering Sea ecosystem<sup>26</sup> which is broadly regarded as the natal grounds for many juvenile species. As changing ocean temperatures affect benthic-pelagic coupling resulting from sea ice, it is likely of increased importance to protect species that contribute to biogeochemical cycling.

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<sup>24</sup> [Bristol Bay Red King Crab Information April 2022](#)

<sup>25</sup> [Sampling nearshore Infaunal ‘weeds’ rather than ‘trees’: Does this orthodoxy undervalue importance of sedimentary biomes?](#)

<sup>26</sup> [Projected future biophysical states of the Bering Sea](#)



Unfortunately, absent consistent non-invasive habitat surveys, the diminishing sophistication of marine habitats is measured by annual bottom trawl surveys - a gear type known to damage habitat - and Fishing Effects models, which we will discuss in the next section. Signs of collapse are therefore most likely to be made visible through the disappearance of commercially valuable indicator species, such as crab - though attributing a cause to collapse within a system that requires “Best Scientific Information Available” becomes difficult without comprehensive documentation of the interconnectedness of ecosystems.

## Ecosystem Consequences

We have shown substantial evidence that bottom contact of PTR gear is significantly higher than what would be expected given the gear definition and performance standard, and remain deeply concerned about the consequences for vulnerable long-lived species that comprise habitat.

Of particular concern to us is a species of megafauna found in the Bering Sea called a sea pen, or sea whip, named *Halipteris willemoesi*. This sea whip is a large octocoral, a colonial organism fed by polyps that work cooperatively; together, these colonies form forest-like patches of biogenic habitat. According to local knowledge, these soft-coral colonies are some of the only structures found in the soft-bottom habitat of the Bering Sea which provide substantial vertical relief. Some assurances have been made within the NPFMC process that seafloor disturbance from trawl gear is akin to disturbance from seasonal storms. However, these slow-growing, long-lived octocorals inherently give evidence to the contrary. Dislodging them, tow by tow, is analogous to clear-cutting. Such disturbance is not adequately considered in Essential Fish Habitat considerations, as those models consider the only long-lived species to be hard corals, which attach to hard structures, and which are considered to exist at depths greater than 300 meters in depth. The likely reason for this discrepancy in consideration is that distribution of Essential Fish Habitat (EFH) features is modeled based upon seafloor sediment type, not informed by observed habitat. As a result, presumably due to the widespread distribution of the soft sediment preferred by *H. willemoesi* and relatively uncommon distribution of hard structures at depths greater than 300 meters that experience fishing pressure, estimated Fishing Effects calculations defy best available science and grossly overstate the recoverability and susceptibility of sea whips from disturbance (Table 1).

A study published in 2002 using axial rod diameters of 12 sea whips indicated slow growth rates in the coral’s first ten years of life, about 4 cm per year; a slightly increased growth rate of about 6 cm per year until the colony is about twenty years old, and then slow again to 4 cm per year from the thirty to fifty years of the oldest colonies studied<sup>27</sup>. This study concludes that

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<sup>27</sup> [Axial rod growth and age estimation of the sea pen, \*Halipteris willemoesi\* Kölliker](#)

“the longevity of these organisms and the biogenic habitat they may provide to other species makes it essential that fishing related impacts be studied in detail, particularly as fishing activities reach greater depths and fish stocks decline.” In alignment with the iterative nature of the scientific process, the study concludes that “it remains to be seen if the growth rates and age estimates determined in this study are accurate; however, in light of their importance as biogenic habitat, it is prudent to take heed of the high estimated longevity of *H. willemoesi*, which may approach or exceed 50 years.” Cohesive groves of these corals, effectively old-growth forests of the sea, could likely take more than a century to re-establish.

Additionally, a controlled study<sup>28</sup> published in 2009 assigned colonies to 1 control group and 3 treatment groups, designed to mimic trawl damage including:

dislodgement, fracture of the axial rod, and soft tissue abrasion. Fifty percent of dislodged colonies demonstrated the ability to rebury their peduncles and recover to an erect position. Most of these colonies eventually became dislodged again without further disturbance and only one was erect at the final observation. None of the fractured colonies were able to repair their axial rods and only one was erect at the experiment's conclusion. [...] Tissue losses among the dislodged and fractured sea whips increased throughout the experimental period and were mainly due to predation by the nudibranch *Tritonia diomedea*, which appeared to react with a strong scavenging response to sea whips lying on the seafloor. The presence of predators in areas where sea whips are disturbed may exacerbate trawl effects since damaged or dislodged colonies are more vulnerable to predation.

The impacts described above are serious and increasingly irreversible considering repeated and unmitigated disturbance. Accuracy of assessments measuring the sustainability of the pollock fishery, including but not limited to the Marine Stewardship Council certification, are contingent upon the quality of data layers including fishing effort and habitat classification<sup>29</sup>, which are demonstrably assumptive and potentially misleading within the NPFMC's EFH process. Sensitive habitat and benthic organisms are being damaged at an alarming rate, with arbitrary rates of recoverability and susceptibility applied in modeling of fishing effects. Those impacts continue without any opportunity for recovery.

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<sup>28</sup> [Response of the sea whip \*Halopteris willemoesi\* to simulated trawl disturbance and its vulnerability to subsequent predation](#)

<sup>29</sup> [The effect of habitat and fishing-effort data resolution on the outcome of seabed status assessment in bottom trawl fisheries](#)

While the sustainability of the pollock fishery as a single species fishery has been globally celebrated, the ecosystem around this fishery is in peril. Failing to fully consider the significant bottom contact of PTR means ignoring long-term damage to important habitat features — like slow-growing octocorals, *Modiolus* beds and various highly productive seafloor sediments — that underpin a complex and increasingly fragile ecosystem, and provide irreplaceable resources for resilience and recovery at times of ecosystem stress. Habitat loss and climate change are influencing biodiversity in ways that are difficult to anticipate. Individual species suffering from significant declines are not isolated casualties of the climate, but are instead stress indicators that signal a need for scrutiny and conservation by other harvests within that same ecosystem, including careful consideration of their impact on EFH and other components of that ecosystem matrix. Even without considering the ongoing impacts of climate change, improvements are warranted in this fishery considering habitat impacts alone. However, *particularly* in a time of climate change, due diligence in assessing habitat damage is needed to protect food web integrity, recovery resources for collapsed species, the ongoing productivity of other species (i.e. trophic cascade), and perhaps most importantly the integrity of ocean biodiversity inextricably linked to intact, healthy habitat. These are the most critical, baseline tools of resilience in the ocean.

Advancements in technology have been incentivized and applied for decades to increase the efficiency of harvesting fish, and it is questionable whether an appropriate counterbalance of consistent, non-invasive monitoring has been engineered to support habitat integrity and biodiversity: most of the information that informs EFH analysis comes from bottom trawl surveys. We are concerned about the diminished sophistication and understanding of marine habitats, which inevitably results in collapses and that are generally only made visible with the disappearance of commercially valuable species. Status quo approaches to habitat protections and ecosystem interactions are insufficient. In the long term, they require greater sophistication of assessment and monitoring, and in the short term they require mitigation of historically unaddressed and serious impacts.

### **Potential Actions**

A substantial focus of pollock management is not over-harvesting the target species, which has been a success. However, we have demonstrated that there are substantial shortcomings of current management processes that require remediation.

We call for pollock industry participants including fishermen, managers and sustainability proponents, to reconsider the accuracy of calculations of habitat disturbance and to enforce a prohibition on seafloor contact of the doors, footrope, net and other components of the pelagic trawl gear used in the pollock fishery. If PTR gear incorporated bottom sensors and was fished

at least three meters off the seafloor, we may begin the century-long process of healing benthic habitat to return functionality to the entire ecosystem. Absent these modifications, the only appropriate alternative to mitigate damage to seafloor habitat is to enact the same fishing area closures for PTR gear as NPT gear and to require similar gear modifications to raise various components off the seafloor.

We recognize the concerns from industry that change can constrain the fleet, and potentially increase costs or decrease revenue. Those impacts are challenging; however, it is recognized across time and space that healthy habitat is essential to biodiversity, which supports the greater marine ecosystem. Skillful, evolving stewardship is of the utmost importance, especially considering the increasing stressors these ecosystems are experiencing.

Continuous review of current fishing impacts on stock health, and comprehensive ecological analysis to support responsible decision-making, is critical to maintain a viable ocean commons.

Table 1. Recovery and susceptibility values for each benthic habitat feature included in the Fishing Effects model. Low and high impact estimates represent the lower and upper bounds for recovery and susceptibility based on the ranges used the 2022 NPFMC EFH review.

	Habitat feature	Low impact estimate parameters		High impact estimate parameters	
		Recovery (years)	Susceptibility (proportion)	Recovery (years)	Susceptibility (proportion)
Geological	Bedforms	0	0.25	1	0.5
	Biogenic burrows	0	0.25	1	0.5
	Biogenic depressions	0	0.25	1	0.5
	Boulder, piled	5	0.25	10	0.5
	Boulder, scattered, in sand	0	0	1	0.1
	Cobble, pavement	0	0.1	1	0.25
	Cobble, piled	5	0.5	10	1
	Cobble, scattered in sand	0	0.1	1	0.25
	Granule-pebble, pavement	0	0.1	1	0.25
	Granule-pebble, scattered, in sand	2	0.1	5	0.25
	Sediments, surface/subsurface	0	0.25	1	0.5
	Shell deposits	2	0.1	5	0.25
Biological	Amphipods, tube-dwelling	0	.1	1	0.25
	Anemones, actinarian	2	0.25	5	0.5
	Anemones, cerianthid burrowing	2	0.25	5	0.5
	Ascidians	1	0.25	2	0.5
	Brachiopods	2	0.25	5	0.5
	Bryozoans	1	0.1	2	0.25
	Corals, sea pens	2	0.25	5	0.5
	Hydroids	1	0.1	2	0.25
	Macroalgae	1	0.1	2	0.25
	Mollusks, epifaunal bivalve, <i>Modiolus modiolus</i>	5	0.25	10	0.5
	Mollusks, epifaunal bivalve, <i>Placopecten magellanicus</i>	2	0.25	5	0.5
	Polychaetes, <i>Filograna implexa</i>	2	0.25	5	0.5
	Polychaetes, other tube-dwelling	1	0.25	2	0.5
	Sponges	2	0.25	5	0.5
	Long lived corals	10	0.5	50	1

Table 1

**Submitted by:** Paul Fairbanks

**Community of Residence:** Chugiak

**Comment:**

Hello, thank you for allowing me to comment on these important issues. I would like to voice my support for proposals 14 - 17. Alaska is a special place. And PWS is one of the jewels in Alaska. While I support commercial fishing, I do not support trawling this special area. I feel like trawling is not a responsible use of our precious resources. Bycatch is too high and too wasteful. Proposals 14 - 17 have my support.

---

**Submitted by:** Ralph and Cheryl Feriani

**Community of Residence:** Anchorage

**Comment:**

We support Proposals #48,58,59,70.

We oppose Proposals #44,45,46,47,49,50,54,55,56,57,60,61 because this is one of our primary sources of securing our fish supply for our family. The commercial fishermen have been franchised way beyond their share of Alaska's fishing resources. We believe the number of king salmon need to be increased no matter what the cost is to commercial, subsistence, and sport use.

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**Submitted by:** Angela Ferrari

**Community of Residence:** Anchorage

**Comment:**

I am in support of proposal #14. Trawlers should be eliminated from trawling in this area.

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**Submitted by:** Christopher Ferrieri

**Community of Residence:** Lake Louise and wasilla

**Comment:**

I am opposed to this proposal. I live at lake Louise most of the winter as a trapper in the area. I fish the lake as well. There are far too many anglers already at the lake and the burbot numbers over the years have been in

decline in my opinion. I also believe there are more folks out there already keeping more and also doing set lines as I've found some and reported in the past as well found set lines atop the ice after a weekend. I firmly believe this will decimate the population.

---

**PC215**

**Submitted by:** Hope Finley

**Community of Residence:** Valdez

**Comment:**

As a PWS purse seine permit holder I comment the following:

Proposal 73+74

I am in support of proposals 73 and 74.

Proposals 75+76

I am NOT in support of proposals 75+76.

Proposal 77

I am strongly NOT in support of proposal 77. VFDA was established as a PNP, originally and intentionally left out of the allocation plan and serves two main user groups: PWS Purse seine and sport/recreation harvest. The harvests collected from this hatchery (focusing on cost recovery as well) has, in no geographical or physiological sense, anything to do with any other user group in the sound. I do not believe there is any logical purpose to include the efforts and numbers of VFDA into the PWS Management and Salmon Enhancement Allocation Plan. If one wants to exercise the (seemingly decreasing) benefits of seining, by all means roll the dice and buy in.

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**PC215**

**Submitted by:** Hope Finley

**Community of Residence:** Valdez

**Comment:**

Proposal 78

As a PWS purse seine permit holder and a resident of Valdez, Alaska I strongly DO NOT support Proposal 78. This proposal comes to the Board of Fish weak with no evidence supporting its claim. This proposal is an uneducated hypothesis that could greatly damage the coastal and statewide economy. "Hatchery fishery contributions ... made up 33% of the statewide commercial harvest exvessel value". Prince William Sound hatcheries are some of the top-ranked producers, cutting egg-take would mean millions lost in ex-vessel value as well as the 2% fish tax, which on some years could also be millions lost. It is my opinion that reducing egg-take production by 25% will not provide answers to the scientific questions raised in proposal 78. It will only be noticeable to the small business owners and coastal economies that depend on that revenue.

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Alaska Department of Fish & Game  
 Board of Fisheries Division  
 Attn: Art Nelson, Executive Director & Board of Fisheries Members  
 P.O. Box 115526  
 1255 W. 8th Street  
 Juneau, AK 99811-5526

November 26, 2024

RE: Prince William Sound Management Area Proposals 14-17

Dear Board of Fisheries members,

On behalf of the undersigned Alaska businesses, we are writing in support of Proposals 14, 15, 16, and 17 that seek Board of Fisheries action to update Alaska regulations for the pelagic trawl pollock fishery in the Prince William Sound Management Area under 5 AAC 28.263.

“The waters of [Prince William Sound] are critical to the area’s characters and economy, sustaining more than 300 species of fish that are essential to traditional subsistence practices, commercial seafood production, and sport fishing.”<sup>1</sup>

PWS and state coastal waters are vital to Alaska businesses:

- In the 2022 season, tourism in Alaska is estimated a \$5.6 billion impact, and in 2023, visitors contributing \$158 million<sup>2</sup> in state revenues. Many of these visitors traveled to coastal communities, booked fishing trips, and traveled on commercial vessels.
- PWS supports strong and vibrant land and ocean based recreation and tourism sectors, critical commercial salmon and directed groundfish fisheries and serve as vital sources of wild food for Alaska Native communities, PWS based communities and residents from as far away as Anchorage and Fairbanks

Under 5 AAC 28.263, ADF&G manages the only pelagic trawl fishery in solely state waters. This trawl fishery jeopardizes these PWS vital economic drivers and the sustainable and wild Alaska seafood market that small boat directed fisheries depend on.

We acknowledge and agree that commercial fisheries are important to the people and state of Alaska, however, it is vitally important that a single commercial fishery is not given free rein to compromise the health of the ecosystem, the businesses, and the livelihoods of the communities of PWS, and the access of Alaskans to subsistence, sport, and other commercial fisheries. We request the Board of Fisheries pass Proposals 14, 15, 16, and 17. We believe these proposals can address the severe impacts of indiscriminate fishing with trawl gear, and protect the vital PWS waters and those Alaskan businesses that depend upon a healthy and robust ecosystem.

Thank you very much for your careful consideration of this matter.

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<sup>1</sup> <https://mckinleyresearch.com/wp-content/uploads/2022/04/2020072-pws-ceds-brochure-final-web.pdf>

<sup>2</sup> <https://www.alaskatla.org/sites/default/files/2024-04/Memo%20AK%20State%20Revenues%202023.pdf>



Sincerely,

Fish Alaska & Hunt Alaska Magazine  
Eagle River, AK  
Melissa Norris  
Publisher/ Owner

El Capitan Lodge  
Craig, AK  
Scott Van Valin  
Owner

B&J Sporting Goods, B&J Tackle Repair,  
and B&J Tackle Box  
Anchorage and Whittier, AK  
Troy Arnold  
Owner

Sacred Acre Music Festival  
Ninilchik, AK  
Chris Miller  
Director

Alaska Fresh  
Cordova and Anchorage, AK  
Adra Kusnirova  
Owner

Heavy Weather Fish Co.  
Bristol Bay, AK  
Kaitlin Kramer  
Owner

FishHound Expeditions  
Willow and Girdwood, AK  
Adam Cuthriell  
Owner

Icy Bay Lodge  
East Icy Bay, AK  
Todd Robertson  
Owner

Sakred Salmon  
Kenai, AK  
Lisa Rodgers  
Owner

Taiga Tooth B&B  
Talkeetna, AK  
Michael Eastman  
Owner

Chrome Cult Custom Rods  
Juneau, AK  
Jason Rivers  
Owner

Norcoast Marine Surveyors, Inc.  
Sitka, AK  
James Steffen  
President

Buckshot & Bobby Pins  
Skagway, AK  
Kristine Harder  
Owner

Main Street Hotel Tap & Grill  
Kenai, AK  
Annalea Lott  
Manager

**Submitted by:** Matthew Fitzmayer

**Community of Residence:** Fairbanks

**Comment:**

I oppose proposals 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, and 72. All of this in some manner unfairly restrict my ability to provide food for my family in a safe manner, all seemingly to provide for a bigger catch for commercial fisheries and fish wheel type operations. I rely on the ability to charter a dip net boat to safely accomplish feeding my family. The dip net charter relies on people like me to continue to provide for their family. As resident's of the state of Alaska the government shouldn't be working against either of these goals at the behest of commercial fisheries.

I support proposals 48, 58, 59, and 70. These proposals will in various ways make the current dip netting regulations safer and more fair. Especially by allowing a longer float distance, this will reduce congestion and the likely hood of a mid river collision caused by having to look so quickly for the stop point

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**Submitted by:** Jessica Fitzwater

**Community of Residence:** Girdwood

**Comment:**

I strongly oppose 75, 76 , 77 and 78

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**Submitted by:** Russell Fitzwater , F/V Gore Point

**Community of Residence:** Girdwood

**Comment:**

I am opposed to proposals 75 and 76, The 50-50 allocation split between the purse seine fleet and the drift gillnet fleet is based on long term data, to achieve a long term solution. Changing this system to a system that uses only a few years to provide allocation would be a disaster. The gillnet fleet is ahead in total catch value under this current rotation. This plan is not intended to achieve similar catch from year to year but over a long term period.

I am also opposed to proposal 77, for obvious reasons. This idea has been brought up and voted down before... anyone who feels this would benefit long term has zero understanding of the fishery.

Proposals 73, and 74, would help to provide more opportunities for fisherman to achieve higher income per vessel, or in some cases any profit at all. It would also help simplify the management practices of F&G as the fleet size would be smaller.

Thank you

Best Regards

Russell Fitzwater

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**PC219**

**Submitted by:** Russell Fitzwater

**Community of Residence:** Girdwood

**Comment:**

I have already submitted comments

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**PC220**

**Submitted by:** Rachel Flanagan

**Community of Residence:** Anchorage

**Comment:**

Proposal 65: SUPPORT

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible.

We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**Proposals 46 and 47- SUPPORT**

Makes logical and complete sense for accurate reporting. With current technology, this should not create any additional burden on these user groups and passing these proposals is in the best interest of all of us and the resource.

**Proposal 48-OPPOSE**

The commercialization of subsistence resources goes against their intended use and there should be no person or business collecting profit from these resources. The commercialization of subsistence fisheries was banned at the statewide level and was written into regulation in 2024. Therefore, this proposal would have to be taken up at the statewide meetings to take any action.

**Proposal 49-SUPPORT****Proposals 51 - OPPOSE**

The proposal states in their own words "Nevertheless, we believe that the use of genetic data to estimate stock-specific exploitation rates ultimately may be required for ensuring the long-term conservation of diversity of Copper River sockeye and king salmon populations...". ADFG manages from a scientific approach and should continue that way. Especially from local area biologists and not a proposal from the federal government. ADFG biologists already have the ability to restrict commercial effort early in the season and have proven to use these actions when necessary. We don't need additional rules if they already exist.

**PROPSALS 52, 53 – OPPOSE****Proposal 54- SUPPORT****Proposal 55-SUPPORT**

Share the burden of conservation across all user groups.

**Proposal 56 and 57-OPPOSE**

Proposals written by single individuals with no organizational backing. It is hard to support any drastic consolidation proposals like these without a full survey of the fleet or any organizational backing/support.

Would have catastrophic allocation/harvest effects on Setnet fishermen in Eshamy District as well as single permit holder drift fishermen. Eshamy district is extremely small and the only one in Area E where Setnetters are allowed to fish. There is already a high amount of user group problems due to space limitations that law enforcement has to deal with. This would only up that dramatically; More gear conflict, higher amounts of fish harvested at lines, and higher consolidation of harvest. Also, much more chaos in highly competitive terminal harvest areas and more allocative of one user group.

**Proposal 58-OPPOSE****Proposal 59-OPPOSE****Proposal 60 and 61-SUPPORT****Proposal 62-SUPPORT****Proposal 63-OPPOSE****Proposal 64-SUPPORT****Proposal 65-SUPPORT****Proposal 66-SUPPORT****Proposal 67-SUPPORT****Proposal 68 and 69-SUPPORT****Proposal 70-OPPOSE**

**Proposal 71-SUPPORT**

**Proposal 72-SUPPORT**

**Proposals 75, 76, 77-OPPOSE**

Written by individuals with no organizational backing/support.

I oppose these allocative proposals that intend to change the allocation plan that has been working over time. Removing the 5 year averages is not logical, as we current permit holders and new entrants would be using an allocation based on historical data that is no longer pertinent to current stakeholders.

**Proposal 78-OPPOSE**

Written by individual with no organizational backing/support.

Strongly oppose this proposal that would have severe economic effects on our fleet and communities. There is still no conclusive evidence to suggest this proposed decrease in pink and chum production. The board has repeatedly turned down these proposals for this reason.

**Proposal 79-SUPPORT**

**Proposal 80-SUPPORT**

**Proposal 81-SUPPORT**

**Proposal 83-OPPOSE**

**Proposal 84-SUPPORT**

**Proposal 85-OPPOSE**

**Proposals 86-88-SUPPORT**

**David Fleming**

**Submitted by:** Oliver Fleshman

**Community of Residence:** North Pole

**Comment:**

Mainly #s 44 to 72, The State constitution got it right on it's purpose and guideless when addressing how to priorities fishery's. Unfortunately it seems in the last few decades the fisheries board has given priority to the biggest voice, the commercial fishing lobbies, rather then the common use of the people of Alaska.

Article 8, § 1 and § 3. state: "available for maximum use consistent with the public interest" . and "...fish, wildlife, and waters are reserved to the people for common use."

This implies that Personal Use and Subsistence Use fishing should have priority over Commercial Fishing and Sport Use

The first part of Article 8, § 15 starts with the statement "No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State"

However the increasing limits and rules being placed on subsistence and personal use fisheries gives the appearance that special privilege is given to Commercial Fishing.

**Submitted by:** James Ford

**Community of Residence:** Anchorage

**Comment:**

Proposal 71. I oppose.

The only way my family can access the copper river to harvest salmon is by boat. Due to mobility restrictions the safest way to harvest fish for my family is by boat. Over all there are several proposals looking to

Restrict Access one way or another. I support the use of charter services in the personal use Dipnetting area on the copper river.

**PC224**

**Submitted by:** Nicholas Fountain

**Community of Residence:** North Pole

**Comment:**

Lake Louise is becoming too popular and increasing the daily burbot will have a negative effect in the future of the fishery.

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**PC225**

**Submitted by:** Mark Freshwaters

**Community of Residence:** Skagway

**Comment:**

Please vote to stop the destructive bottom trawl fisheries in Prince William Sound.

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**PC225**

**Submitted by:** Mark Freshwaters

**Community of Residence:** Skagway

**Comment:**

Personal use red salmon fishing on the Copper River has been hugely import for my family for many many years.

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**PC225**

**Submitted by:** Mark Freshwaters

**Community of Residence:** Skagway

**Comment:**

Protect the currant satis of personal fisheries on the Copper River.

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**Submitted by:** Craig Frkovich

**Community of Residence:** WA

**Comment:**

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the destructive and unsustainable commercial PWS pollock trawl fishery as specified in Proposals 14 and 16. If the Board fails to pass either of these Proposals, I would highly encourage them to consider measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.

**Submitted by:** John Fuccillo

**Community of Residence:** Eagle River

**Comment:**

My family and I began using this fishery in 2020 upon return to the state in 2019 as my military career ended. We pride our household on personal procurement of sustainable options and the Copper River is key to our annual sustenance requirement for our family. We've always been cognizant of the preservation of resources and use 100% of each fish we harvest. We fillet the meat, separate and use the bellies for jerky, consolidate any scrap meat for soup, and boil the remaining carcass to make our own fish broth. Loss of this fishery would create a void in our family's sustenance plan as well as rob me of the opportunity to teach my son the importance of self sustainment and conservation. To maintain a level of safety use of a charter is key to our continued success of fishing these waters. Please feel free to reach out for any amplifying data.

**Submitted by:** Robert Funkhouser

**Community of Residence:** Bellingham WA

**Comment:**

I have fished for Salmon & Cod in Kodiak & Prince William Sound every year since 1974. I currently Purse Seine for Salmon in PWS. I appose Proposal # 78. This proposal Would deepen the hardships that we are already experiencing. The last two years we have lost a large amount of jobs and money in our local communities. A 25% reduction in our hatcheries would only make our recovery harder to accomplish. The person that submitted Proposal # 78 doesn't reference and scientific evidence that hatcheries pose a threat to wild salmon. In the last two years the State of Alaska has lost 7,000 seafood related jobs and 1.8 Billion in revenue. Many coastal communities are struggling. I don't believe this proposal helps PWS or the State of Alaska recover. Thank You for your time.



**Submitted by:** Debbie Ganley

**Community of Residence:** North pole

**Comment:**

It's important for a family to have options to be able to fish when and where they can while fish are running

---

**Submitted by:** Harrison Gardiner

**Community of Residence:** Anchorage

**Comment:**

I don't feel there is any need for an increase in daily burbot limits for lake Louise. Being on the road system I worry that it will lead to over fishing.

---

**Submitted by:** Freddie Garza

**Community of Residence:** Wasilla

**Comment:**

I have been participating in the Copper River personal use fishery since the early 2008 to help feed my family. I've rarely been allowed to keep even one king. Since the limit has been reduced to one and routinely closed by emergency order, I usually am releasing 2 to 5 king salmon back. Additionally, Ahtna corporation trespassing signs have increasingly been put up in an attempt to further restrict Alaskans from utilizing this fishery. I adamantly oppose any further restrictions by the passing of BOF proposal 63, 64, and 65.

---

**Submitted by:** Damon Gendron

**Community of Residence:** Anchorage

**Comment:**

No on Proposal 60: It's already hard enough to make it to Chitna and dip net from around Alaska. Families already have to plan for a couple of days off of work, travel and food just catch the greatest salmon in the world. By lowering the number of fish to be retained, people will not think it's worth the trip. Which also affects the cash flow of the town of Glennallen. This is why I don't Halibut fish. It is way too much money and time just to catch 2 fish that you are not guaranteed. Even the salmon are not a guaranteed do to low numbers bad weather, the river rising to high limiting spots to fish.

---

**Submitted by:** Keith Genter

**Community of Residence:** Wasilla

**Comment:**

I:

OPPOSE Proposals

44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

SUPPORT Proposals

48,51,52,53,58,59,70

Please don't allow the commercial fishermen priority over our locals. Alaska residents should have priority over our natural resources

---

**Submitted by:** Catherine Giessel

**Community of Residence:** Anchorage

**Comment:**

Oppose proposals: 44,45,46,47,50,54,55,56,57,60-69,71

Support proposals: 48,51,52,53,58,59,70

I oppose proposals that limit Alaskans from accessing the subsistence fish that feed our families. I support maintaining access to food stocks in Alaska as part of Alaska's effort to "grow our own" and be self-sustaining.

---

**Submitted by:** Richard Giessel

**Community of Residence:** Anchorage

**Comment:**

I OPPOSE Proposals

44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

I SUPPORT Proposals

48,51,52,53,58,59,70

Richard Giessel

---

**Submitted by:** Raymond Gilbert

**Community of Residence:** Anchorage

**Comment:**

To start with, it is a misconception that the sportsman is the cause of the fishery's decline. That falls on the commercial community, weather it is local or foreign, they have raped our fish numbers, catching and killing the immature fish before they have the opportunity to grow and return to their native rivers. If the fishing is to be saved look for the entities that do the most damage instead of blaming the fishermen who are low impact.

---

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I'm a 3rd generation fisherman in Prince William Sound. I've fished every summer of my life with my mom and dad then bought in myself in 1990 drift gill net fishing, never skipping a summer. I started seining on my own in 1998. I worked the Exxon oil spill.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Steven Gildnes

A solid black rectangular box used to redact the signature of Steven Gildnes.

Cordova

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 1, 25, and 26 - OPPOSE**

*-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.*

*-Establish a personal use sablefish fishery in Prince William Sound.*

*-Establish a Prince William Sound groundfish personal use fishery.*

The proposal 25 author states that the sablefish GHF is not being fully harvested, and that therefore a surplus supports reallocating leftover GHF to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHF.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

**SUPPORT this proposal with CDFU**

**Proposal 2 - SUPPORT**

*Reopen waters closed to the harvest of groundfish in Prince William Sound*

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

**SUPPORT this proposal with CDFU**

**Proposal 3 - SUPPORT**

*Modify Prince William Sound groundfish pot specifications*

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

**OPPOSE this proposal with CDFU****Proposal 5 - OPPOSE**

*Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.*

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

**SUPPORT this proposal with CDFU****Proposal 6 - SUPPORT**

*Allow for release of rockfish in mechanical jig and hand troll fisheries.*

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

**OPPOSE this proposal with CDFU****Proposal 7 - OPPOSE**

*Establish gear specifications for directed lingcod fisheries in Prince William Sound.*

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

### **SUPPORT this proposal with CDFU**

#### **Proposal 8 - SUPPORT**

*Modify the Prince William Sound pacific cod fishery guideline harvest level.*

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

### **SUPPORT this proposal with CDFU**

#### **Proposal 9 - SUPPORT**

*Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.*

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

### **SUPPORT this proposal with CDFU**

#### **Proposal 10 - SUPPORT**

*Modify pot limit in the Prince William Sound Pacific cod fishery.*

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.

Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

### **SUPPORT this proposal with CDFU**

#### **Proposal 13 - SUPPORT**

*Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.*

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

### **SUPPORT this proposal with CDFU**

#### **Proposal 19 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

### **SUPPORT this proposal with CDFU**

#### **Proposal 20 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

### **SUPPORT this proposal with CDFU**

#### **Proposal 22- SUPPORT**



*Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.*

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

### **SUPPORT this proposal with CDFU**

#### **Proposal 23 - SUPPORT**

*Prohibit the retention of sablefish from state waters.*

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

### **SUPPORT this proposal with CDFU**

#### **Proposal 27 - SUPPORT**

*Modify rockfish bag and possession limits.*

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

### **OPPOSE this proposal with CDFU**

#### **Proposal 28 - OPPOSE**

*Modify the rockfish area, bag and possession limit.*

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

**Proposal 29 - SUPPORT**

*Create additional provisions for yelloweye rockfish management.*

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

**SUPPORT this proposal with CDFU**

**Proposal 31 - SUPPORT**

*Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.*

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

**SUPPORT this proposal with CDFU**

**Proposal 32 - SUPPORT**

*Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.*

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING

SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

### **OPPOSE this proposal with CDFU**

#### **Proposal 33 - OPPOSE**

*Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.*

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

### **SUPPORT this proposal with CDFU**

#### **Proposal 34 - SUPPORT**

*Repeal the Registration Area E Tanner crab harvest strategy.*

The current Area E Tanner crab harvest strategy is unworkable, as it relies too heavily on trawl surveys and does not allow for a fishery in the majority of the PWS area. At the 2021 meeting the Area E Tanner crab harvest strategy was passed as a placeholder that allowed for a small fishery in 2022. ADFG assured fishermen that a more holistic Tanner crab harvest strategy was forthcoming, and would be presented for the 2024 meeting.

CDFU encouraged fishermen to participate in the Tanner crab test fisheries over 4 years because the ADFG stated that they needed this data to create a harvest strategy for PWS. Instead, ADFG gave us a harvest strategy which did not use any test fishery data. This created no possibility of opening some of the best fishing grounds found in the test fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 35 - SUPPORT**

*Modify the harvest strategy for Prince William Sound Tanner crab.*

At the 2021 BOF meeting, ADFG and fishermen worked together at the last minute to create a flawed PWS Tanner crab management plan. The BOF, ADFG and CDFU expressed interest in working together to create a more workable plan before the 2024 BOF meeting.

CDFU reached out to ADFG multiple times in the last year to collaborate on proposals related to PWS Tanner crab but received extremely limited input. Proposal 35 is our best attempt to create a workable harvest strategy for PWS Tanner crab that will result in a sustainable fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 36 - SUPPORT**

*Increase the pot limit in the Prince William Sound Tanner crab fishery.*

At the 2017 BOF meeting the pot limit was reduced from 75 pots to 30 pots. This was part of a large proposal by the ADFG to establish a new harvest strategy for PWS Tanner crab. No justification for the reduction was given by ADFG in their proposal or in ADFG staff comments. There was not public support for the reduction.

Pot limits should be set with input from the fleet. The pot limit reduction passed as part of a total rewrite of the Tanner crab management strategy. That harvest strategy was flawed in many ways, and working through that distracted from input on the pot reduction section.

Higher pot limits reduce handling of immature and female crabs because it increases soak times. This allows time for small crab to leave the pot via the escape rings. As we have in many different areas and other fisheries, Fishermen will ask the BOF to lower the pot limit if fishery participation increases and crowding becomes an issue from too many pots.

The small pot limit makes prospecting PWS exceptionally time consuming and expensive. Since the fishery reopened, there is a large portion of PWS, especially the outside waters, that have not been explored. Tanner crabs move in schools. They are easily missed when too few pots are spread over too large an area. This pot limit is damaging to the resource because it increases the handling of undersized crab. It also is economically damaging to fishery participants because it increases the bait, fuel, and time required to execute the fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 37 - SUPPORT**

*Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.*

ADFG does not need the ability to adjust pot limits to manage the fishery. For instance, the length of salmon seines isn't adjusted from season to season based on run size. The daily reporting requirement in regulation allows ADFG to closely monitor the pace of the fishery and close it when there is a danger of exceeding the GHL. There is no regulation allowing adjustment to pot limits by ADFG for Southeast or Kodiak, instead static pot limits are set by the BOF. In 2022 ADFG utilized this regulation to lower the pot limit to 25. This was a significant reason the fleet was unable to harvest the GHL that season.

### **SUPPORT this proposal with CDFU**

#### **Proposal 38 - SUPPORT**

*Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.*

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 39 - SUPPORT**

*Establish season dates for a commercial Golden King crab fishery.*

Southeast Alaska has a booming Golden King crab fishery without a fishery independent assessment.

“The Alaska Department of Fish and Game (department) evaluates stock status and establishes guideline harvest levels (GHLs) for each management area using fishery dependent data including: catch per unit of effort (CPUE), harvest and biological information (carapace length, weight, and maturity) from dockside sampling landings. No population abundance estimates are obtained for GKC stocks.” -from the Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season

Our fishermen have seen ample evidence of Golden King crab abundance. ADFG has no assessment for Golden King crab in PWS and to date has stated no intention of developing the harvest strategy current regulation stipulates. It seems that this fishery will stay closed forever without action by the BOF.

### **SUPPORT this proposal with CDFU**

#### **Proposal 40 - SUPPORT**

*Adopt a harvest strategy for golden king crab in Prince William Sound.*

Golden King crab fisheries must depend on CPUE in the commercial fishery to set its GHL, because there is no good way to survey. This proposed harvest strategy is similar to the one being used with success in Southeast.

As the fishery develops and distinct populations of Golden King crab are discovered, it will be prudent to break the area into districts. In the meantime, the statistical areas that are already in regulation allow for a reasonable starting point until the next BOF meeting cycle.

Local PWS economies are struggling following years of depressed fish prices, increased overhead costs for operations, and increased efforts of time for static harvests. It is imperative that the BOF direct ADFG to open these small scale fisheries, because they are simply not being proactively opened without BOF direction.

### **OPPOSE this proposal with CDFU**

#### **Proposal 42 - OPPOSE**

*Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.*

Crab fisheries close during the summer months because this is when crab are molting and most susceptible to mortality from handling.

We oppose the opening of a sport fishery for King or Tanner crab without also opening a commercial fishery.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 46, 47 - SUPPORT**

*-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.*

*-Require in season reporting in subsistence and personal use fisheries.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**OPPOSE this proposal with CDFU**

**Proposal 48 - OPPOSE**

*Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.*

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

**SUPPORT this proposal with CDFU**

**Proposal 49 - SUPPORT**

*Prohibit transport services in the Glennallen Subdistrict.*

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 51, 52, 53 - OPPOSE**

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.*

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

**SUPPORT this proposal with CDFU**



**Proposal 55 - SUPPORT**

*Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.*

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

**OPPOSE this proposal with CDFU****Proposal 58 - OPPOSE**

*Amend the Copper River King Salmon Management Plan.*

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**OPPOSE this proposal with CDFU****Proposal 59 - OPPOSE**

*Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.*

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**SUPPORT this proposal with CDFU****SUPPORT this proposal with CDFU****Proposal 60, 61 - SUPPORT**

*-Modify the annual limit for the Chitina Subdistrict.*

*-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.*

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

### **SUPPORT this proposal with CDFU**

#### **Proposal 62 - SUPPORT**

*Allow inseason adjustment of the Copper River personal use maximum harvest level.*

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

### **OPPOSE this proposal with CDFU**

#### **Proposal 63 - OPPOSE**

*Amend the opening date of the Chitina Subdistrict personal use fishery.*

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of

695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 64 - SUPPORT**

*Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.*

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

### **SUPPORT this proposal with CDFU**

#### **Proposal 65 - SUPPORT**

*Require a weekly permit and inseason reporting in the Chitina Subdistrict.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

### **SUPPORT this proposal with CDFU**

#### **Proposal 66 - SUPPORT**

*Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.*

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

**SUPPORT this proposal with CDFU**

**Proposal 67 - SUPPORT**

*Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.*

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 68, 69 - SUPPORT**

*-Prohibit dipnetting from a boat in the Chitina Subdistrict.*

*-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.*

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

**OPPOSE this proposal with CDFU**

**Proposal 70 - OPPOSE**

*Extend the lower boundary of the Chitina Subdistrict.*

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

**SUPPORT this proposal with CDFU**

**Proposal 71 - SUPPORT**

*Prohibit guiding in the Chitina Subdistrict.*

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

### **SUPPORT this proposal with CDFU**

### **OPPOSE this proposal with CDFU**

#### **Proposal 78 - OPPOSE**

*Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.*

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their

goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

**SUPPORT this proposal with CDFU**

**Proposal 79 - SUPPORT**

*Close Main Bay to all fishing during hatchery cost recovery operations.*

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

**SUPPORT this proposal with CDFU**

**Proposal 80 - SUPPORT**

*-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.*

Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

**SUPPORT this proposal with CDFU**

**Proposal 81 - SUPPORT**

*Modify the area open to sport fishing near the Main Bay Hatchery.*

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

**OPPOSE this proposal with CDFU**

**Proposal 83 - OPPOSE**

*Allow a resident sport angler to use two rods when fishing for salmon.*

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

**SUPPORT this proposal with CDFU**

**Proposal 84 - SUPPORT**

*Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.*

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

**OPPOSE this proposal with CDFU**

**Proposal 85 - OPPOSE**

*Modify the bag and possession limit for coho salmon.*

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

### **SUPPORT this proposal with CDFU**

#### **Proposal 86 - SUPPORT**

*Modify the sport fishing area and season dates in Ibeck Creek.*

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

#### **Proposal 87 - SUPPORT**

*Modify the sport fishing area and season in a Copper River Delta system.*

We firmly support protections for spawning coho salmon in the Copper River Delta.

### **SUPPORT this proposal with CDFU**

#### **Proposal 88 - SUPPORT**

*Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.*

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

### **SUPPORT this proposal with CDFU**

#### **Proposal 96 - SUPPORT**

*Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.*

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and



fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

**SUPPORT this proposal with CDFU**

**Proposal 98 - SUPPORT**

*Align Prince William Sound herring and salmon management area descriptions.*

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

**Proposal 99 - SUPPORT**

*Define commercial herring fishery districts in Prince William Sound.*

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

**SUPPORT this proposal with CDFU**

**Proposal 100 - SUPPORT**

*Adopt a Kayak Island District herring management plan.*

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

**Proposal 102 - SUPPORT**

*Allow commercial fishery permit holders to harvest herring for the own use as bait.*

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

**Submitted by:** Steven Gildnes

**Community of Residence:** Cordova

**Comment:**

My name is Steven Gildnes. I'm a 3rd generation area E Cordova commercial fisherman.

I support proposition #56, & 57. Permit stacking for drift fishermen would benefit area E in an active fishing boat reduction.

I support proposition #73, & #74. Permit stacking in one name for the seine fishery. A reduction in active seine boats fishing would greatly improve the area E seine fishery.

Thank you

Steven Gildnes

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**Submitted by:** Emelyn Gilliam

**Community of Residence:** Talkeetna

**Comment:**

Most measures proposed are big Corp entities that will impact small businesses and communities, limiting Alaskan resident's ability to harvest their own food. Fish and Game need to comply with the state constitution that says subsistent fishing gets priority over commercial fishing.

---

**Submitted by:** Peregrine Gilliam

**Community of Residence:** Talkeetna

**Comment:**

Most measures proposed are big Corp entities that will impact small businesses and communities, limiting Alaskan residents ability to harvest their own food. Fish and Game needs to comply with the State constitution granting subsistence rights over commercial fishers.

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**Submitted by:** Vern Gilliam

**Community of Residence:** Talkeetna

**Comment:**

Most measures proposed are big Corp entities that will impact small businesses and communities, limiting Alaskan residents ability to harvest their own food. Fish and Game needs to comply with the State constitution granting subsistence rights over commercial fishers.

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## Darin Gilman Comments for Cordova Prince William Sound Board of Fish 2024

Proposal 1- Oppose

Proposal 2- Support

Proposal 4- Support

Proposal 5- Oppose, this would disenfranchise small D class vessels from operating in 3A halibut fisheries. If Fish and Game sees an issue from larger class halibut vessels entering Prince William Sound, Proposal 4 is a step wise approach for these issues on the commercial side. The rockfish harvest is predominately sport caught fish, and they consistently catch 3-fold of what the commercial fleet harvests in a year. Addressing the “commercial issue” while ignoring the root of the problem (sport overharvesting) is flawed way to deal with this issue.

Proposal 7- Oppose, there is no conservation concern for Ling Cod and there is little incentive to target Ling Cod as a directed fishery. Ling Cod averages are about .90 cents a pound cut weight. The Entire fishery Outside and Inside waters is worth roughly 30,000 dollars yearly. No one is targeting Ling Cod while they are halibut fishing. Halibut is worth 5-6 bucks a pound.

It wouldn't help save rockfish like the department implied because it wouldn't deter anyone from setting their long line in the same spots over a few ling cod. It would be just penalizing halibut fishermen that are already trying to make their trips as efficient as possible.

Proposal 14,15,16,17 -Support

Proposal 19- Support

Proposal 20- Support

Proposal 22- Support

Proposal 23- Support

Proposal 25, 26- Oppose

Proposal 27- Support

Proposal 29- Support

Proposal 31, 32- Support

Proposal 35,35,36 38, 39 40, 41 -Support

Proposal 42- Oppose

Proposal 43- Support, Lair Pots have zero by-catch and this is currently an underutilized resource. This proposal could allow small-scale fishery for a community that could use some diversification.

Proposal 44- Support

Proposal 46- Support

Proposal 47- Support

Proposal 48- Oppose, it is illegal to pay for access to or in a subsistence fishery. Guided boats are a means of access, and it is wrong in the essence of subsistence fishing to commercially profit off subsistence users. Referring to RC 66 and RC 67 from the 2021 Cordova meeting, fish wheels are not allowed to be used as personal gain the fish wheel is the access to the fishery, a guided boat is access to the fishery as well and should not be used for personal gain in subsistence fisheries.

Proposal 49- Support

Proposal 51,52,53- Oppose

Miles lake Sonar is an index, it has a built in buffer for proper escapement. The daily management objective is based off historic averages, in recent years due to delayed break up on the Copper River the run has been trending a few days later than historic run timing. This has led to the misconception of the commercial fleet disproportionally harvesting the early stocks on the copper river.

ADFG has shown the ability to adaptably manage this fishery by restricting and liberalizing time and area whether the Sockeye Run is showing strength or weakness. Salmon management has always been a tricky science because managers need the ability to adapt to rapid changes in the fishery year to year.

Proposal 51,52 and 53 would essentially take away the Drift Gillnet fleet as the manager's most important tool to gauge the strength of the run before the miles lake sonar counter is clicking.

70 percent of the daily management objective number has no basis in science, it is a lewd and crude attempt to cherry pick data to reallocate a fully allocated resource by pretending there is a weakness of early stocks in the copper river. The Tanada Creek weir has shown no steady decline like ATRIC has made it believe. The real issue at hand is that the CPUE is down due to less people using fish wheels in the upper copper basin. It is a trend change in harvest strategy, not a trend in population declines of upper copper river salmon stocks. The 70 percent proposed number has zero basis in science and is completely out of

compliance in its relation to National Standard One in the Magnuson Act that requires that fisheries be operated for Maximum Sustained Yield.

ATRIC and Wrangell-St Elias Park Service are living in a world of delusion where they think they can manage salmon fisheries like a horse with blinders on around the track.

Proposal 55- Support, all users should be included in King Conservation for stewardship of the resource. The Commercial Fleet has given up its historic King harvest area.

Proposal 56, 57- Support, the overall total amount of net allowed in the fishery is 80,250 fathoms, by allowing stacking of permits for every permit stacked 100 fathoms would be removed from the water. With the past several seasons our permit prices have crashed; inflation is eating out the bottom line of this industry, and the grounds price of salmon hasn't reflected the increased cost of operation in our industry. The intent of the limited entry was to allow a stable local economy to thrive in Alaska and allow managers to manage effectively and efficiently. This is a small stepwise approach to allow more stability in this fishery and it would become more attractive for young entrants to make a livelihood out of commercial fishing on the Copper River and Prince William Sound.

Proposal 58, 59- Oppose, this is reallocating a resource away from a fully allocated resource away from the commercial and subsistence users in the Copper River Basin. The Personal Use fisheries already exceed their in-river allocation number on years of low and high returns. By giving Fish and Game the ability to liberalize their limits this only gives them the incentive to increase the harvestable surplus in-river. The commercial fleet is the necessary tool to harvest the harvestable surplus for the silent majority that enjoy salmon on their plates statewide and nationwide.

Proposal 60, 61- Support. The increased efficiency of the PU Dipnet fishery is well documented, and they have been harvesting more than their allocated numbers. Allowing EO authority allows managers to increase bag limits on years of high abundance, but in the years of lower abundance the bag limit should reflect what the system was intended to handle.

Proposal 64- Support, At the recent statewide meeting, the board advised dealing with this as a regional proposal. All the other PU fisheries are operated as one permit. The other 4 out of 5 Personal Use Fisheries are targeting different stocks and are operated under one permit. Why is Copper River treated differently when the accessibility is the same? The accessibility between the 5 drainages is anywhere from a 2–4-hour drive from Anchorage. There is precedent in game law that has like regulation of reflecting an overall bag limit of a species each year, such as Sitka Black Tail Deer and Black Bear.

Proposal 65- Support

Proposal 66- Support

Proposal 67- Support

Proposal 68- Support

Proposal 69- Support

Proposal 70- Oppose, allowing more opportunity to a user group that is already exceeding their allocation is just reallocating a fully allocated resource. Also just moving a line further down the river will only change where the congestion is, which will be next to the new line if adopted. It will not change anything except allowing more opportunities to a fleet that has become increasingly more efficient in the past 15 years.

Referring to the 2021 Cordova Board Cycle and their deliberations on this same proposal it was clear it would increase harvest and wouldn't alleviate congestion. With King Salmon struggling on the Copper River, it would not be wise to expand opportunity to an in-river user group that has to repeatedly catch and release kings throughout their season.

One solution to eliminate congestion would be to limit commercial guide operations on the river, like a form of limited entry to protect the resource and manage it effectively.

Proposal 71- Support

Proposal 72-Support

Proposal 75, 76, 77- Support

Proposal 78- Oppose

Proposal 79- Support

80,81- Support, the intention of these two proposals is to eliminate or reduce sport fishermen from harming PWSAC property and interfering with PWSAC cost recovery and brood operations. Currently there are a lot of fish being harmed and wounded by 'snagging' which can lead to disease in salmon, reducing the productivity of the hatchery in the following years. Holes in the barrier seine leads to quality degradation of sockeye salmon over the season by allowing more fish to enter the AGZ than intended, these fish turn into a low-quality or useless resource. By allowing Sport Fishermen to continue this practice it is the equivalent of having the foxes in the hen house. There is ample opportunity all over Main Bay and the rest of Prince William Sound to harvest sockeye salmon.

Proposal 83- Oppose, Allows an unnecessary amount of harvest for King Salmon in Prince William Sound. One troll is efficient enough to harvest troll caught kings. Allowing two could potentially double the efficiency of the troll king salmon fleet.

Proposal 84- Support

Proposal 85- Oppose

Proposal 86, 87, 88 -Support

Proposal 95- Support

Proposal 96- Support with modifications to eliminate the reallocation of sac roe fishery to the bait fishery if left unharvested. There will be ample opportunities for the bait fishery to harvest herring as shown by it being opened for the first time in 26 years.

Proposal 97- Support

Proposal 98, 99, 100, 102- Support

Proposal 101- Oppose, these are Prince William Sound Herring that would be harvested in this area and there is an existing Herring Management Plan in Area E.

Proposal 102- Support



**Submitted by:** Shawn Gilman

**Community of Residence:** Cordova, Ak

**Comment:**

As the author of this proposal I would like to clarify the purpose of the proposal after reading ADFG staff comments. The proposal intent was to add the line in the regulation 5 AAC 01.620 Lawful gear and gear specifications that a vessel engaged in a subsistence gillnet fishery may have extra gillnet gear on board. To be clear this is currently legal as per Subsistence staff and there is no such statute in place that limits the amount of gear preparedness for this subsistence activity or any other that I could find or staff could supply me with. I submitted the proposal hoping to have this codified into regulation to alleviate stress to the subsistence users who wish to be prepared. Thank you for considering.

**Submitted by:** Shawn Gilman

**Community of Residence:** Cordova, Ak

**Comment:**

I am writing to further explain my proposal. The intent was to insert the language linking the commercial fisheries upriver and downriver again when the department becomes more conservative. The upriver commercial interest I intended to link were the commercial sport guide services. The language of measures referenced were as follows per the regulation;

- (A) reduce the annual limit for king salmon;
- (B) modify other methods and means not specified in this paragraph;
- (C) designate the fishery as a catch and release fishery only;
- (D) close specific waters to sport fishing for king salmon.

I believe having this codified as a conservation link again would be helpful and give staff cover to be conservative for a brief window in time that can be reversed once more information is available.

I also agree with staff that they have never addressed or supported any regulation proposed over the last 30 years trying to define commercial guiding in the Personal use fishery. Thank you

**Submitted by:** Shawn Gilman

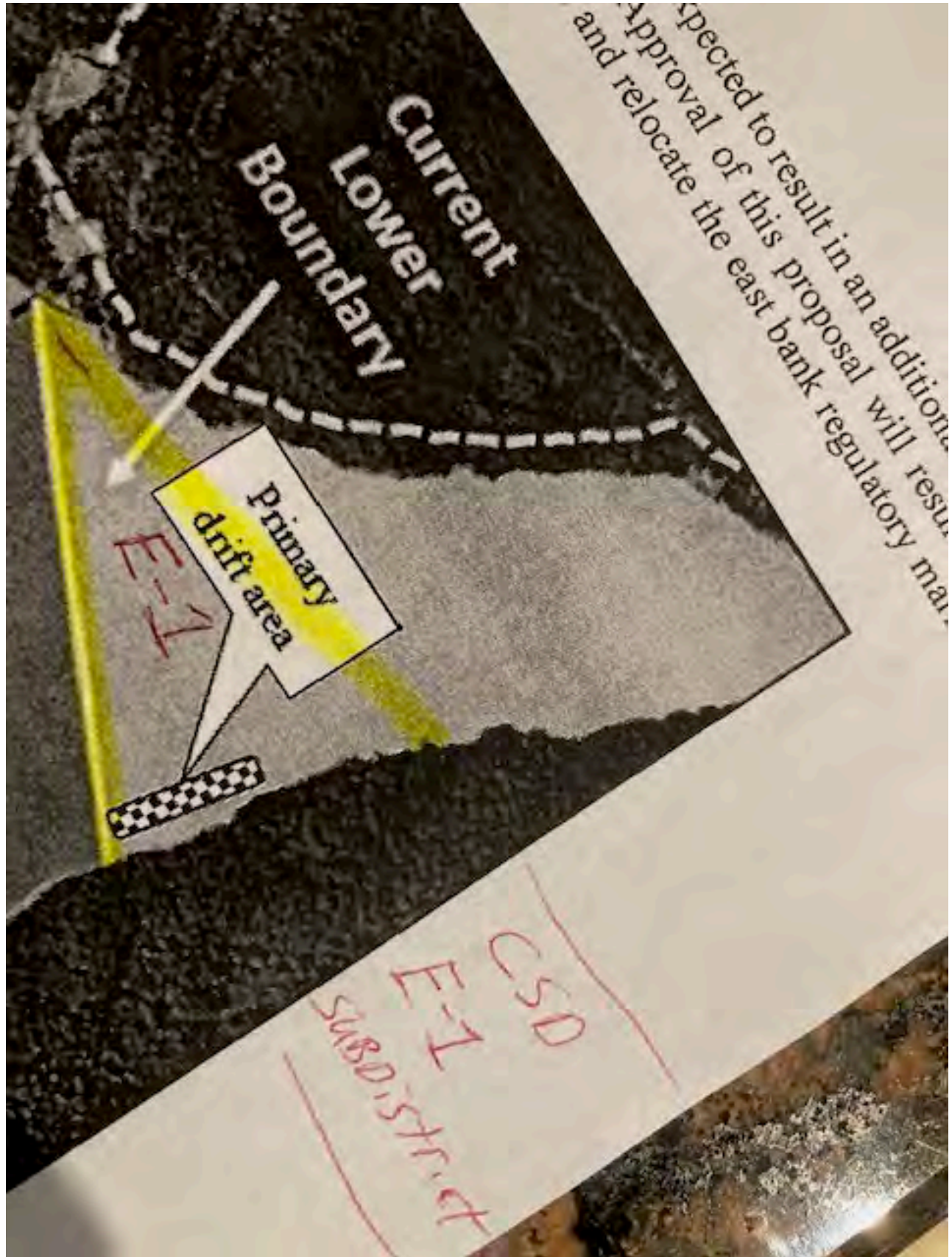
**Community of Residence:** Cordova Ak

**Comment:**

I am commenting on my proposal number 69 after reading staff comments. I wrote this proposal with a 43 year history of the copper river fisheries. The reason I submitted this proposal is substantiated further in proposal 70's intent and language stating that PU boating activity has increased substantially. The boating if any in

1984 was vastly different . The department opposes my proposal to create new lines or time requirements for this newer activity and its new harvest pattern to give themselves tools to allow the fishery to continue with methods more in line with past practices and take some pressure off of a condensed portion of the escapement if necessary. On the very next proposal they stay neutral to drawing a new line to expand opportunity. I believe it is time to address the changes created by horsepower, electronics, communications and boat ramp access in this fishery in a positive way. I have attached a picture of a subdistrict example. thank you.

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**Submitted by:** Lincoln Glab

**Community of Residence:** North Pole

**Comment:**

I believe the current guidelines on limits should be retained and all current regulations regarding river access should remain as is. With the cost of food in Alaska, and the limited agriculture, it is imperative that this food source not be restricted any more to residents.

Regarding charter operators at Chitina, I agree that regulations should be placed on them. They are becoming a monopoly and are currently engaging in what should be considered illegal practices. The main charter operator is currently charging customers based on the amount of fish they are landing. This should be illegal, as the charter operator is not stocking the fish, therefore should not be allowed to charge per fish, or over a specific limit, if it is within the allotted limit set forth by the state. They also commandeer the river and treat all other boats as they do not have a right to be there.

The burdens should be placed on commercial fisheries and those that make money off of Alaskas Natural Resources.

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**Submitted by:** Ryan Goldfuss

**Community of Residence:** Eagle river

**Comment:**

I am a life long Alaskan. I have been fishing in prince William sound for the last 5 years and have been blown away with the declining sport fishing catch in such a short period of time. The halibut in the area are being decimated by the wasteful bycatch taking place near the sound. I am pleading for a period of relief to allow our marine ecosystem to bounce back to some sort of normal.

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**Submitted by:** Ivan Gordas

**Community of Residence:** Eagle River

**Comment:**

Oppose: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72

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**Submitted by:** Stephen Goudreau

**Community of Residence:** Valdez Ak 99686

**Comment:**

Commenting on PWS walleye pollock pelagic trawl fisheries

I have lived in Valdez since the spring of 1974 and have sport fished in the PWS every year.

It is getting tougher in the last 15 years to find the Halibut holes and we have to go further out into the sound. Now in order to consistently catch fish we have to go to the south side of Montague island.

This summer we saw a trawler fishing just off the light house on Hichenbrook island.

We attempted to fish off the light house but were there for 2 hours without a hit.

I feel strongly we need to keep the trawlers out of PWS, I feel they are impacting not only the halibut but the salmon and rockfish also.

I realize they can only keep the pollock but they are killing and dumping fish that we need to sustain our way of life.

Please keep the trawlers out of the Prince William Sound.

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

November 25, 2024

Re: **Oppose** Proposals 14, 15, 16, and 17 – PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Buck Graham, I am the Captain of the 83 foot, Kodiak-owned Ocean Invictus and I live with my wife and two young kids in Kodiak, AK. I have been fishing in Alaska for over 25 years, and for the last 16 years I have both fished pollock in the Sound and spent my summers there tendering salmon. Since 2021, I have also brought my son and daughter, who are now 8 and 10 years old, with me to the Sound for tendering so they can see first hand the importance of a healthy fishery. My now-adult son also tendered the Sound with me; I care deeply about passing this fishery to future generations. The Prince William Sound pollock fishery is often our first paycheck of the year and it gives my kids food and clothes.

I do not believe you should close the Prince William Sound fishery, because it will also devastate our salmon there. Pollock are known predators of salmon and if the number of pollock increases without harvest, they will eat the young salmon and our commercial salmon fishery will struggle. After this past summer, I am already scared for the future of salmon in the Sound and these actions will only make it worse. Although young, my kids are passionate about fishing and I hope that they can be the next generation of Alaskan fishermen and women.

There is no valid reason to close this fishery, for bycatch when this is an extremely clean fishery. Our catch is primarily pollock and less than 0.015% salmon and 0.013% rockfish each year on average. When fishing for pollock in Federal Fisheries, I have my electronic monitoring (EM) system on 100% of the time; my vessel doesn't operate any differently on our few PWS trips a year than we do when doing Federal pollock. The State has the ability to put observers on our vessels and they could if they were concerned about what we are doing. We have to get permission from the State Manager to enter the sound and set gear; the State controls how many boats are fishing and we do daily check -ns so they know exactly what we are catching.

I urge the Board to oppose Proposals 14, 15, 16, and 17 regarding the Prince William Sound Pollock Fishery. Thank you for the opportunity to comment.

Sincerely,



Buck Graham  
Captain, F/V Ocean Invictus



**Submitted by:** Brock Graziadei

**Community of Residence:** Fairbanks

**Comment:**

Alaskans come first to be fed. Commercial fishing is after Alaskans are fed.

---

**Submitted by:** Troy Graziadei

**Community of Residence:** North Pole

**Comment:**

I feel Alaskans residents should come first to feed thier families first before Commercial fishing and I feel trawlers are bad due to the enormous by-catch that they harm and destroy,. Please accept my submissions of opposition and or support of the following proposals

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**Submitted by:** Dustin Grimes

**Community of Residence:** Palmer

**Comment:**

I'm submitting this comment on behalf of myself and family of four. We have been using chitna personal use dip netting fishery for the last 10 years and it has been a large source of our food intake for the remainder of those years. It is a disgrace to see what the board of fish has done in leaning into commercial fisheries taking the priority. I'm a strong believer in subsistence first and personal use second. Everything else takes a backseat until those needs are met for Alaskan's. We the people own these resources and going against what the people want is in a direct violation of our state constitution , and though I'm not sure, probably the oaths you have taken. I will do everything I can for my children to be able to fish these Waters when they have children. Hi This is a way of life for a lot of alaskans and your decisions will affect the future of these fisheries. I strongly oppose any increase in commercial take. I strongly oppose any restrictions on subsistence fishing.

---

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I've gillnetted in Area E for 40 plus years, also commercial gillnet, crab and groundfish fisheries in Washington and Oregon. But, the Area E fishery is my main sustaining fishery.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

John Grocott

A solid black rectangular box used to redact the signature of John Grocott.

Cordova and Ilwaco WA



**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 1, 25, and 26 - OPPOSE**

*-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.*

*-Establish a personal use sablefish fishery in Prince William Sound.*

*-Establish a Prince William Sound groundfish personal use fishery.*

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

**SUPPORT this proposal with CDFU**

**Proposal 2 - SUPPORT**

*Reopen waters closed to the harvest of groundfish in Prince William Sound*

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

**SUPPORT this proposal with CDFU**

**Proposal 3 - SUPPORT**

*Modify Prince William Sound groundfish pot specifications*

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

**OPPOSE this proposal with CDFU****Proposal 5 - OPPOSE**

*Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.*

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

**SUPPORT this proposal with CDFU****Proposal 6 - SUPPORT**

*Allow for release of rockfish in mechanical jig and hand troll fisheries.*

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

**OPPOSE this proposal with CDFU****Proposal 7 - OPPOSE**

*Establish gear specifications for directed lingcod fisheries in Prince William Sound.*

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

### **SUPPORT this proposal with CDFU**

#### **Proposal 8 - SUPPORT**

*Modify the Prince William Sound pacific cod fishery guideline harvest level.*

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

### **SUPPORT this proposal with CDFU**

#### **Proposal 9 - SUPPORT**

*Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.*

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

### **SUPPORT this proposal with CDFU**

#### **Proposal 10 - SUPPORT**

*Modify pot limit in the Prince William Sound Pacific cod fishery.*

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.

Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

### **SUPPORT this proposal with CDFU**

#### **Proposal 13 - SUPPORT**

*Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.*

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

### **SUPPORT this proposal with CDFU**

#### **Proposal 19 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

### **SUPPORT this proposal with CDFU**

#### **Proposal 20 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

### **SUPPORT this proposal with CDFU**

#### **Proposal 22- SUPPORT**

*Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.*

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

### **SUPPORT this proposal with CDFU**

#### **Proposal 23 - SUPPORT**

*Prohibit the retention of sablefish from state waters.*

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

### **SUPPORT this proposal with CDFU**

#### **Proposal 27 - SUPPORT**

*Modify rockfish bag and possession limits.*

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

### **OPPOSE this proposal with CDFU**

#### **Proposal 28 - OPPOSE**

*Modify the rockfish area, bag and possession limit.*

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

**Proposal 29 - SUPPORT**

*Create additional provisions for yelloweye rockfish management.*

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

SUPPORT this proposal with CDFU

**Proposal 31 - SUPPORT**

*Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.*

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

SUPPORT this proposal with CDFU

**Proposal 32 - SUPPORT**

*Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.*

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING

SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

### **OPPOSE this proposal with CDFU**

#### **Proposal 33 - OPPOSE**

*Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.*

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

### **SUPPORT this proposal with CDFU**

#### **Proposal 34 - SUPPORT**

*Repeal the Registration Area E Tanner crab harvest strategy.*

The current Area E Tanner crab harvest strategy is unworkable, as it relies too heavily on trawl surveys and does not allow for a fishery in the majority of the PWS area. At the 2021 meeting the Area E Tanner crab harvest strategy was passed as a placeholder that allowed for a small fishery in 2022. ADFG assured fishermen that a more holistic Tanner crab harvest strategy was forthcoming, and would be presented for the 2024 meeting.

CDFU encouraged fishermen to participate in the Tanner crab test fisheries over 4 years because the ADFG stated that they needed this data to create a harvest strategy for PWS. Instead, ADFG gave us a harvest strategy which did not use any test fishery data. This created no possibility of opening some of the best fishing grounds found in the test fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 35 - SUPPORT**

*Modify the harvest strategy for Prince William Sound Tanner crab.*

At the 2021 BOF meeting, ADFG and fishermen worked together at the last minute to create a flawed PWS Tanner crab management plan. The BOF, ADFG and CDFU expressed interest in working together to create a more workable plan before the 2024 BOF meeting.

CDFU reached out to ADFG multiple times in the last year to collaborate on proposals related to PWS Tanner crab but received extremely limited input. Proposal 35 is our best attempt to create a workable harvest strategy for PWS Tanner crab that will result in a sustainable fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 36 - SUPPORT**

*Increase the pot limit in the Prince William Sound Tanner crab fishery.*

At the 2017 BOF meeting the pot limit was reduced from 75 pots to 30 pots. This was part of a large proposal by the ADFG to establish a new harvest strategy for PWS Tanner crab. No justification for the reduction was given by ADFG in their proposal or in ADFG staff comments. There was not public support for the reduction.

Pot limits should be set with input from the fleet. The pot limit reduction passed as part of a total rewrite of the Tanner crab management strategy. That harvest strategy was flawed in many ways, and working through that distracted from input on the pot reduction section.



Higher pot limits reduce handling of immature and female crabs because it increases soak times. This allows time for small crab to leave the pot via the escape rings. As we have in many different areas and other fisheries, Fishermen will ask the BOF to lower the pot limit if fishery participation increases and crowding becomes an issue from too many pots.

The small pot limit makes prospecting PWS exceptionally time consuming and expensive. Since the fishery reopened, there is a large portion of PWS, especially the outside waters, that have not been explored. Tanner crabs move in schools. They are easily missed when too few pots are spread over too large an area. This pot limit is damaging to the resource because it increases the handling of undersized crab. It also is economically damaging to fishery participants because it increases the bait, fuel, and time required to execute the fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 37 - SUPPORT**

*Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.*

ADFG does not need the ability to adjust pot limits to manage the fishery. For instance, the length of salmon seines isn't adjusted from season to season based on run size. The daily reporting requirement in regulation allows ADFG to closely monitor the pace of the fishery and close it when there is a danger of exceeding the GHL. There is no regulation allowing adjustment to pot limits by ADFG for Southeast or Kodiak, instead static pot limits are set by the BOF. In 2022 ADFG utilized this regulation to lower the pot limit to 25. This was a significant reason the fleet was unable to harvest the GHL that season.

### **SUPPORT this proposal with CDFU**

#### **Proposal 38 - SUPPORT**

*Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.*

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 39 - SUPPORT**

*Establish season dates for a commercial Golden King crab fishery.*

Southeast Alaska has a booming Golden King crab fishery without a fishery independent assessment.

“The Alaska Department of Fish and Game (department) evaluates stock status and establishes guideline harvest levels (GHLs) for each management area using fishery dependent data including: catch per unit of effort (CPUE), harvest and biological information (carapace length, weight, and maturity) from dockside sampling landings. No population abundance estimates are obtained for GKC stocks.” -from the Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season

Our fishermen have seen ample evidence of Golden King crab abundance. ADFG has no assessment for Golden King crab in PWS and to date has stated no intention of developing the harvest strategy current regulation stipulates. It seems that this fishery will stay closed forever without action by the BOF.

### **SUPPORT this proposal with CDFU**

#### **Proposal 40 - SUPPORT**

*Adopt a harvest strategy for golden king crab in Prince William Sound.*

Golden King crab fisheries must depend on CPUE in the commercial fishery to set its GHL, because there is no good way to survey. This proposed harvest strategy is similar to the one being used with success in Southeast.

As the fishery develops and distinct populations of Golden King crab are discovered, it will be prudent to break the area into districts. In the meantime, the statistical areas that are already in regulation allow for a reasonable starting point until the next BOF meeting cycle.

Local PWS economies are struggling following years of depressed fish prices, increased overhead costs for operations, and increased efforts of time for static harvests. It is imperative that the BOF direct ADFG to open these small scale fisheries, because they are simply not being proactively opened without BOF direction.

### **OPPOSE this proposal with CDFU**

#### **Proposal 42 - OPPOSE**

*Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.*

Crab fisheries close during the summer months because this is when crab are molting and most susceptible to mortality from handling.

We oppose the opening of a sport fishery for King or Tanner crab without also opening a commercial fishery.

**SUPPORT this proposal with CDFU**

**Proposal 43 - SUPPORT**

*Establish a directed octopus fishery in Prince William Sound.*

In recent years the GHL for PWS octopus has not been harvested but fishermen are interested in an octopus fishery.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 46, 47 - SUPPORT**

*-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.*

*-Require in season reporting in subsistence and personal use fisheries.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**OPPOSE this proposal with CDFU**

**Proposal 48 - OPPOSE**

*Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.*

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

**SUPPORT this proposal with CDFU**

**Proposal 49 - SUPPORT**

*Prohibit transport services in the Glennallen Subdistrict.*

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 51, 52, 53 - OPPOSE**

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.*

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the

extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 55 - SUPPORT**

*Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.*

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

### **OPPOSE this proposal with CDFU**

#### **Proposal 58 - OPPOSE**

*Amend the Copper River King Salmon Management Plan.*

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

### **OPPOSE this proposal with CDFU**

#### **Proposal 59 - OPPOSE**

*Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.*

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed

manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 60, 61 - SUPPORT**

*-Modify the annual limit for the Chitina Subdistrict.*

*-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.*

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

**SUPPORT this proposal with CDFU**

**Proposal 62 - SUPPORT**

*Allow inseason adjustment of the Copper River personal use maximum harvest level.*

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

**OPPOSE this proposal with CDFU**

**Proposal 63 - OPPOSE**

*Amend the opening date of the Chitina Subdistrict personal use fishery.*

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing

curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 64 - SUPPORT**

*Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.*

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

### **SUPPORT this proposal with CDFU**

#### **Proposal 65 - SUPPORT**

*Require a weekly permit and inseason reporting in the Chitina Subdistrict.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot

continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**SUPPORT this proposal with CDFU**

**Proposal 66 - SUPPORT**

*Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.*

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

**SUPPORT this proposal with CDFU**

**Proposal 67 - SUPPORT**

*Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.*

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 68, 69 - SUPPORT**

*-Prohibit dipnetting from a boat in the Chitina Subdistrict.*

*-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.*

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

**OPPOSE this proposal with CDFU**

**Proposal 70 - OPPOSE**

*Extend the lower boundary of the Chitina Subdistrict.*



The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

### **SUPPORT this proposal with CDFU**

#### **Proposal 71 - SUPPORT**

*Prohibit guiding in the Chitina Subdistrict.*

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

### **SUPPORT this proposal with CDFU**

#### **Proposal 72 - SUPPORT**

*Close sport fishing for salmon based on water temperature in the Gulkana River.*

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

### **OPPOSE this proposal with CDFU**

#### **Proposal 78 - OPPOSE**

*Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.*

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify

regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

### **SUPPORT this proposal with CDFU**

#### **Proposal 79 - SUPPORT**

*Close Main Bay to all fishing during hatchery cost recovery operations.*

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

### **SUPPORT this proposal with CDFU**

**Proposal 80 - SUPPORT**

*-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.*  
 Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

SUPPORT this proposal with CDFU

**Proposal 81 - SUPPORT**

*Modify the area open to sport fishing near the Main Bay Hatchery.*

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

**OPPOSE this proposal with CDFU**

**Proposal 83 - OPPOSE**

*Allow a resident sport angler to use two rods when fishing for salmon.*

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

**SUPPORT this proposal with CDFU**

**Proposal 84 - SUPPORT**

*Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.*

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

**OPPOSE this proposal with CDFU**

**Proposal 85 - OPPOSE**

*Modify the bag and possession limit for coho salmon.*

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

**SUPPORT this proposal with CDFU**

**Proposal 86 - SUPPORT**

*Modify the sport fishing area and season dates in Ibeck Creek.*

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

**SUPPORT this proposal with CDFU**

**Proposal 87 - SUPPORT**

*Modify the sport fishing area and season in a Copper River Delta system.*

We firmly support protections for spawning coho salmon in the Copper River Delta.

**SUPPORT this proposal with CDFU**

**Proposal 88 - SUPPORT**

*Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.*

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly

restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

**SUPPORT this proposal with CDFU**

**Proposal 96 - SUPPORT**

*Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.*

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

**SUPPORT this proposal with CDFU**

**Proposal 98 - SUPPORT**

*Align Prince William Sound herring and salmon management area descriptions.*

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

**Proposal 99 - SUPPORT**

*Define commercial herring fishery districts in Prince William Sound.*

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

**SUPPORT this proposal with CDFU**

**Proposal 100 - SUPPORT**

*Adopt a Kayak Island District herring management plan.*

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

**Proposal 102 - SUPPORT**

*Allow commercial fishery permit holders to harvest herring for the own use as bait.*

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fisherman.

I have been commercial fishing for 6 years.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Finn Gross

[REDACTED]

Girdwood, Alaska

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU



**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fisherman.


I am an Alaska resident. I own a bow picker and an Area E permit that I have fished for the past 12 years.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Geoff Gross

A solid black rectangular box used to redact the signature of Geoff Gross.

Girdwood

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**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

**Submitted by:** Robert Haan

**Community of Residence:** Anchorage, Alaska

**Comment:**

I support proposition 14. Commercial trawlers damage seafloor habitat, and produce significant amounts of bycatch during a time when our salmon runs are declining. I am born and raised in Alaska, and have relied on salmon my whole life to have for meals 3-5 days per week year round. We need to protect our fisheries for our future generations, and one way to do this is to prohibit commercial pollock trawling. Our state is supposed to put subsistence before commercial, which means that we should not be allowing these commercial trawlers to continue to catch salmon as bycatch that they throw away, while people upriver that actually rely on these salmon for food are forced to not fish due to poor run numbers. We should switch from largely out of state commercial trawlers to Alaskan owned commercial fishers like long liners and trollers because they produce next to no bycatch, and result in actual Alaskan residents profiting off of our state's resources.

---

**Submitted by:** Patrick Hagens

**Community of Residence:** Wasilla

**Comment:**

I'm in support of stopping trawling until we figure out how to not disturb the bottom of the ocean floor. Bycatch is also completely out of hand and needs dealt with.

---

**Submitted by:** Paul hagerdon

**Community of Residence:** palmer

**Comment:**

no on proposals #63, #64, #65

any Alaskan willing to do the work should be able to harvest food for their family.

this fishery should not be limited to just 1 ethnic group. that's racist. lets stop fighting and learn to share

---

**Submitted by:** Duane Hahn

**Community of Residence:** Kenai

**Comment:**

I am opposed to Trawlers in Prince William Sound , we have had a reduction in Rock fish limits for sport fishing the past several years, while the Trawlers continue with their wanton waste of the Salmon halibut and rock fish , The trawlers should not be able to continue to dump thousands of pounds of non target species overboard . If I take my family and go fishing out of Whittier and don't have a deep water release, I will get fined by Fish and Game , if I harvest a fish and throw it away I'm in trouble for Wanton waste , It is disgraceful what the BOF , the Feds and the State of Alaska allow to happen to our resources,

---

## Proposals 51, 52, 53 – Oppose

I am very concerned with this proposal as it relies solely on sonar data as the only early season management tool. Currently, early season commercial drift gillnet fishery management in the Copper River district utilizes a variety of tools including commercial catch data from the first several openers as an indicator of run strength and timing. These first several openers (more than 3) are crucial to understanding what the rest of the run may look like, especially when sonar data is not yet reliable – due to icing conditions in the river, weather, ADFG staffing, or other variables. In many recent years, late season ice at Miles Lake has prevented sonar deployment and functionality, and led to a lower-than-expected sonar count for the date.

Additionally, the sonar count is approximately 1 week delayed from fishery timing, meaning that it takes approximately 7 days for fish to transit from the Copper River flats fishery into the river, and then up to the Miles Lake sonar, where they are counted. There is a significant disconnect between the actual fishery and the geographic location where the in-river number is counted. Closing the fishery prematurely based on a sonar number limits

Additionally, local knowledge from our region suggests that fish often hold up in the river until conditions are preferred, resulting in a delayed count on the sonar. It's critically important to understand that sonar estimations are mathematical averages over time and that actual, real-time information depends on a lot more factors, and on any given day, the sonar goals will be higher or lower than predicted due to the real-world nature of fisheries and the fact that salmon are biological creatures that are sensitive to weather and water conditions and return at various times.

Oftentimes, management will close the fishery down if both the sonar data is low and fishery data indicates low abundance and will allow for additional fishing time if indicated, so current management practices maintain the most flexibility possible for ADFG managers.

From an economic standpoint, the early season fishery is the most valuable to the community of Cordova and not just for the fishing fleet – higher early season prices when market conditions are favorable impact the food security and economic conditions of our entire community, including fishing families, ancillary businesses, and improves the quality of life in a community with few restaurants and high grocery prices.

I urge you to consider these points as you make decisions that have profound impacts on multiple communities in the region in which we live.

**Submitted by:** Tom Hall

**Community of Residence:** Valdez/Fairbanks

**Comment:**

I am in favor of 14,15,16,or 17. These all sound like reasonable proposals. There are simply fewer fish, especially halibut in the sound these days. Let's take this down a notch and let the sound recover just a bit.

---

**Submitted by:** Oscar Hall

**Community of Residence:** Eagle River

**Comment:**

As a sport fisherman and veteran, I strongly OPPOSE the following Proposals:  
44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

Additionally, I SUPPORT Proposals 48,51,52,53,58,59,70

---

**Submitted by:** Valerie Hall

**Community of Residence:** Eagle River Alaska

**Comment:**

As a sport fishing person and veteran, I strongly OPPOSE the following Proposals:  
44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

Additionally, I SUPPORT Proposals 48,51,52,53,58,59,70

We must strike a balance and the proposals I oppose are clearly tipping the scale in favor of the commercial fisherman who many live outside the state.

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**Submitted by:** Christine Hamilton

**Community of Residence:** Wasilla

**Comment:**

63,64,65

We all need salmon to feed our families

Not just the natives but everyone we need

To be a state not individual tribes every one matters

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Board of Fish Members,

My name is Michael Hand, I'm a first generation commercial fisherman from Cordova. I am a permit holder in the seine fishery and I participate in the shrimp, gillnet salmon, sablefish and crab fisheries. Thank you for your time and consideration concerning these important Prince William Sound fisheries and proposals.

Over the course of your week in Cordova, you will hear from ADFG management and fishermen from all user groups. As a commercial fisherman, I see the department and the board of fish as important allies in executing sustainable fisheries here in PWS. For some proposals, such as the herring and cod proposals, ADFG has worked hard with fishermen to understand how to start to maximize the resources available. On the crab proposals though, the department hasn't shown a willingness to help fishermen of the Sound begin to find small scale, sustainable fisheries to participate in. As market conditions continue to be questionable for salmon, it's more important than ever to explore other small scale fisheries that can provide area fishermen with alternative revenue streams. While deliberating on these proposals please consider the responsibility you have to support and bolster the businesses that rely on the resources of this area.

When considering the proposals that address salmon allocation, whether in the commercial fishery or between up river and downriver users, I ask that you stick with the status quo. This is not the time to be arguing amongst user groups, I believe our best move forward is to continue to protect the resource through responsible harvest and shared burden of conservation.

I OPPOSE 56 and 57, gillnet permit stacking, because it would have created a larger barrier to entry for a first generation fisherman like myself. It will increase the cost to participate.

I OPPOSE proposal 78 because the hatcheries of PWS and the state create opportunity for all user groups and support the economy of Alaska.

I OPPOSE 51-53 and 63 because they are based on bad science and will not help the sustainable management of the Copper River resource.



November 26, 2024

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

Dear Members of the Board of Fisheries,

I am from Cordova, Alaska, and I am tied to commercial and subsistence fishing. Alaska's salmon hatcheries support my livelihood as a commercial fisherman. Proposal 78 would impact my livelihood and my family greatly. This reduction of hatchery production at a time when salmon-dependent communities need it most would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover,

Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Nelly Hand

A solid black rectangular box used to redact the signature of Nelly Hand.

Cordova, Alaska

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

My name is Nelly Hand, I'm a second generation commercial fisherman, born and raised in a commercial fishing family in Prince William Sound. I am a gillnet permit holder and stakeholder in this fishery. I own and operate a gillnet boat in the Copper River and Prince William Sound district..

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Nelly Hand

A black rectangular redaction box covering the signature of Nelly Hand.

Cordova, Alaska

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:**

SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU



**Submitted by:** Chris Hanna

**Community of Residence:** Soldotna

**Comment:**

The banning of Trawling is LONG OVERDUE. Blatant state and federal government corruption is an embarrassment. The NPMFC is stacked with trawl interests. The raping and pillaging of Akaska's waters must stop. The continuance of this archaic and indiscriminate practice opposes all common sense in the name of short term profit for a very small group of greedy individuals. History has proven this practice to be UNSUSTAINABLE time and time again. Only those who are willfully ignorant or being bribed could possibly support the continuation of trawling in the face of crashing fish stocks and the very basics of habitat and resource conservation

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**Submitted by:** Maura Harkins

**Community of Residence:** Eagle River

**Comment:**

It is important to keep dipnet fish charters accessible to Alaska residents. The fish we caught this year has fed our family through the tough times of increased grocery costs and inflation. Also dipnet fish charters allow for those with limited mobility the opportunity to harvest.

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**Submitted by:** S. Harris

**Community of Residence:** Wasilla

**Comment:**

Close the Prince William Sound walleye pollock pelagic trawl fishery, as follows: Add a new section to 5 AAC 28.263. PWS Walleye Pollock Pelagic Trawl Fishery Management Plan. x) A direct Alaska pollock Pelagic trawl fishery in PWS is prohibited unless; 1) No part or attachment to the Pelagic trawl gear makes contact with the seafloor habitat. 2) There is no bycatch of Chinook salmon in the PWS Pollock Pelagic trawl fishery. Reduce the precipitous rise in Chinook salmon bycatch in PWS taken by the Pollock Pelagic Trawl fishery and reduce disturbances to the seafloor caused by trawling. Numerous Alaskans living in Interior and SouthCentral Alaska gather chinook salmon as part of their annual wildfood source from PWS. Protect the habitat upon which our wildfood source comes.

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Tania Harrison  
Cordova, AK

Thank you for the opportunity to comment. I oppose proposals 73 and 74. Permit stacking has not proved to be beneficial to the economies of coastal Alaskan communities that depend on fishing. Bristol Bay has implemented a permit stacking system which has resulted in greater economic disparity in the fleet between the 'D' vessels and regular vessels and subsequently fewer local and Alaskan participants. At the 2022 Board of Fish, a proposal (Prop 46) similar to Proposals 73 and 74 failed unanimously. Proposals 73 and 74 would harm Alaskan communities by concentrating wealth to a smaller pool of individuals, blocking new entrants and greatly reducing the number of jobs in the industry, both direct (crewmen) and indirect (boat builders, net hangers, skilled laborers etc.).

The market value of a permit should track the health of the fishery, i.e. the capital needed to buy in should be reasonably correlated to the return on the investment. Altering the fair market value of permits through by-backs or permit stacking initiatives disrupts this pattern. When the capital needed for investment becomes artificially higher than what the industry can provide as a return, then access to the fishery becomes reserved for only those with a significant economic advantage. Fishing then no longer is a viable career path for young residents in coastal communities.

In the original proposals for permit stacking in Prince William Sound and in the current proposal for stacking permits in the drift gillnet fishery (Proposal 56), it was argued that permit stacking would provide another avenue for new entrants to the fishery by allowing them to purchase a permit and "stack" it with another permit holder until they had enough capital to purchase their own operation. Proposals 73 and 74 demonstrates the disingenuousness of that argument. Existing permit holders will have far more access to capital and will effectively cut off any chance for a crewman who wishes to purchase a permit to build their own future fishing business.

Allowing permit holders to purchase and fish two permits goes against the principles of limited entry where limiting the number of participants in a fishery to a given level is needed for resource conservation reasons or to prevent economic distress in a fishery, not for the personal enrichment of a few.

**Submitted by:** Samantha Hart

**Community of Residence:** Anchorage

**Comment:**

PROPOSAL 30 Support, residents need to be able to gather sufficient amounts timely

PROPOSAL 39 Support, allow time for king crab population to replenish

PROPOSAL 42 Support with amendments, disagree with the 2 pot limit for both king crab and shrimp

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**Submitted by:** James Hasskamp

**Community of Residence:** Homer

**Comment:**

Please follow the Alaska Constitutional Law as dictated in Article 8 and maintain use of the fisheries resources for common use, subject to sustained yield, with no exclusive or preferential right to a resource by any entity, other than the people (all Alaskans). Stop trawling, too!

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November 24, 2024

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


Dear Board of Fisheries,

I am from Seward, Alaska, and I have been a commercial, sport, and subsistence salmon fisherman in Alaska for over 50 years.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,  
Arne Hatch  
  
Seward, Alaska

**Submitted by:** Trevor Haynes

**Community of Residence:** Fairbanks

**Comment:**

I believe that the right and access to salmon dipnetting for Alaskans should be strongly protected, as it is an important aspect of food security for many Alaskans, including my family of 4. I generally oppose the liberalization of commercial fishing regulations, and generally oppose the restrictions of personal use dipnetting for Alaskan residents. I also consider conservation of salmon stocks in my decisions to support or oppose specific proposals. Given this, I oppose proposals 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, and 72. I support proposals 48, 58, 59, 70. Thank you for considering my written comment.

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

Our family were Area E, drift gillnet permit holders/fishers for 15 years, prior to that set netter crew in Main Bay for 3 seasons, and seine crew from 2018-2022. Our son remains in the fishery, Area E, drift gillnet permit holder.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Carol Hazeltine

A solid black rectangular box used to redact the signature of Carol Hazeltine.

Anchorage

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

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**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

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**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

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**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

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**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

**Submitted by:** Mark Hazeltine

**Community of Residence:** Anchorage

**Comment:**

Opposing 51 52 53

Closing the copper river drift fishery to allow the cumulative goal to be met poses a large risk of over-escapement of the run. Frequent shorter-duration periods would be a better tool to manage catch and continue to collect useful management data from the fishery. Closures in the fishery in the past often lead to large numbers of fish passing through the miles lake sonar, resulting in over escapement of the run. The copper river drift gillnet fishery is the front line of the management plan and data collection.

Prop 59

An increase in the allocation of salmon to personal use and sport fisheries is not justified as the increased pressure in these user groups comes from a population that has not historically or geographically harvested copper river salmon. As with other limited wildlife resources in Alaska, when the resource is not abundant enough to meet the demand of the user group, permits should be issued on a limited basis.

**Submitted by:** Bradley Hefele

**Community of Residence:** Wasilla

**Comment:**

I oppose 63, 64,65, these are totally unacceptable!

**Submitted by:** Wayne Heimer

**Community of Residence:** Fairbanks

**Comment:**

Proposal 51: I'm not so sure the BOF exists to decide who gets which or how many salmon. The Boards of both Fish and Game exist for the purpose of conservation and development of Alaska's fish and game resources. I can see, based on tradition and the implicit allocative function of regulations, how this looks like allocation responsibility.

HOWEVER, there is also a State subsistence priority law that establishes subsistence (for all Alaska residents) as the highest priority use. Should the BOF be the entity to decide whose subsistence (commercial livelihood or immediate food need) is the higher priority?

that sounds like policy making to me, and since policy is the exclusive province of the legislature, it looks like the legislature has already decided immediate food needs are the higher priority. The Board of Fisheries may be 'out of its lane' in deciding allocations by user subgroup.

**Submitted by:** Richard Heller

**Community of Residence:** Butte

**Comment:**

I've lived in Alaska since 2005 when I came up to Fairbanks with the Army. I now live in the Matanuska valley now on Bodenberg Creek, a salmon protected creek. I have fished all over the Kwnai Peninsula and upper cook I let in the past 16 years. I'm dumbfounded when I see what the trawler industry is and has been allowed to do to the federal waters. Facts, trawlers have decimated the ocean in other areas of the world and those countries shut them down. The amount of carbon that is released from this extreme fishing method is also horrendous. Please for the love of this plant and our fish that have disappeared, STOP TRAWLERS mid and bottom. Please. The Yukon people are hurting and I just don't get why the push back from state and federal agencies. Just order them to stop, period.

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

Re: Oppose Proposals 14, 15, 16, and 17 - PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

Hello my name is Mike Helligso. I am a life long Kodiak resident, commercial/subsistence/sport fisherman and a father of three. I started commercial fishing at an early age and have participated in various state and federal Alaskan fisheries through the years including trawl fisheries, salmon, crab and halibut. I love living, working and raising our kids in Alaska, especially in a small tight knit coastal community. Kodiak, like many coastal towns depends on a healthy fishing industry and I've always taken pride in not just being a positive contributor to the community but also making sure future generations of fishers have the opportunities I did. The first time I fished pollock in the winter, was 1997 and the vessel I was on fished out of Seward. The manager of the cannery there explained how the PWS pollock fishery was created as a benefit for the PWS area communities that wanted to participate in processing pollock. I thought that was a pretty good idea for supporting small coastal towns. A few years later the vessel I was crewing on fished pollock in PWS and I've been fishing pollock up there pretty steady through the years ever since, first on deck and now running a family owned vessel.

After participating and being a current participant, in different fisheries around the state I truly believe that ADF&G runs the most communicative, comprehensive and thought out fishery in PWS, with the ability enact measures at a moments notice. Fishing being as fluid as it is requires good communication and the managers of the fishery don't get much sleep at night as the fishery unfolds. I've often wondered how better off other fisheries would be if they were managed in the same style....bycatch numbers taken in pounds instead of pieces that better reflects their all cause natural mortality, low bycatch caps that fluctuate with quota, stringent communicating/reporting, limited number of vessels fishing, retention of all species/ no discarding ect. To me the ADF&G management of the fishery is a great example of effective, collaborative fisheries management.

Even though PWS pollock hasn't been processed in communities around the PWS area in awhile it still is a very important fishery to Kodiak. The pollock up in PWS seem to congregate to spawn sooner than the fish in the central gulf. Fishing on a higher concentration of fish is a beneficial way to mitigating bycatch. A lot of pollock fishing in the beginning of the year starts in PWS for this reason. The Kodiak vendors, cannery work force, longshoreman, fishers ect have been depending on that fishery for awhile now to help pay bills right after the holidays.

Now after participating in the PWS pollock fishery for decades I read these proposals (14-17) as some people think there is a problem with the fishery, not based on merit but on emotion. I know fishing in the state is going through some terribly turbulent times right now but quite frankly these proposals are barking up the wrong tree.

## Prop 14

Midwater trawling in PWS is done with very little bottom contact. Its completely different from the shallow plains of the Bearing Sea where pelagic gear makes bottom contact way more then midwater fisheries on this side of the Chain.

PWS is an amazing area for sure with lots of deep water and steep/hard shelves and banks under the surface. Most midwater fishing in PWS is along these steep and hard edges/banks in the midwater column. If a midwater trawl were to accidentally touch these banks it'd get shredded and either discarded or it'd take time and money to fix plus one loses out on fishing time..... bottom contact is not advantageous. In regards to 0 chinook bycatch, that simply isn't pragmatic to execute the fishery. Lately the GOA has been getting inundated with out of state hatchery chinook, on a level that has never been seen before and showing no signs of slowing down with no regulated caps on those hatcheries. The PWS ADF&G numbers from 2020-2023 show the chinook that are getting caught are getting smaller, same as other fisheries in the Gulf that are seeing large amounts of smaller bait sized hatchery chinook. There is a lot of small out of state hatchery chinook in Alaskan waters.

## Prop 15

I believe the standard that ADF&G has set is very reasonable. As quotas fluctuate a static bycatch cap wont reflect the intent of setting bycatch limits. Small pollock quotas would have a larger percentage of bycatch allowance and bigger quotas with smaller caps would hinder the fishery. Management has the tools to adjust bycatch caps by species and close down areas immediately.

## Prop 16

This proposal is based on a belief, with no evidence to support it.

The belief in this proposal is that rockfish are hard on the bottom at all times and never come off....this is not the case. You would be hard pressed to find anyone that's made a living fishing on the ocean or fished in freshwater that wouldn't agree that fish behavior changes throughout the day and especially between dark and daylight hours. In my experience commercial fishing, when night comes the underwater habits of fish and feed changes. Fish and feed in the midwater column swim up shallower in the column and fish come off the bottom....it seems like lots of things like to lift in the dark. Even species of flat fish prefer being up in the water column at night.

I have participated in directed rockfish fisheries for years and can attest that yes rockfish will go on the bottom but they also travel up in the water column quite a ways.

## Prop 17

This proposal includes redundant monitoring measures.

Management has the right to place on board observers already. I have fished the PWS pollock fishery with both state and federal observers on board. At times we left port heading out for a federal fishery trip with an observer and a spot in the PWS fishery opens up. Now even though the observer was placed for a federal fishery the observer company instructs their observer to monitor/sample the PWS fishery as they would a federal pollock fishery. All trawlers are used to taking observers and now that electronic monitoring is becoming more common, vessel have put on EM systems on but I'm not sure what percentage of GOA trawl vessels are EM capable at this time. The trawl fishery is used to being heavily monitored but electronic monitoring on top of onboard

observers seems excessively redundant/inefficient especially with finances being tight everywhere these days. ,

In closing I feel that it is very important to have collaboration and conversations on issues effecting our state and the people in it but these proposals were made by people, based on emotion, with a certain unawareness of the particulars of the fishery. I would like to see all fisheries thrive for generations and knocking down a successful, sustainable one isn't the way. Thank you for you time.

Sincerely,

Mike Helligso

A handwritten signature in black ink, appearing to read "Mike Helligso". The signature is stylized with a large, looped "M" and a long, sweeping underline.



**Submitted by:** Jenna Hem

**Community of Residence:** Chitina

**Comment:**

47-OPPOSE Redundant, unnecessary

48-SUPPORT Alaskans should have option of safely and effectively fishing with guide service if desired. Not everyone who is subsistence has an expendable boat or ability to maintain or locate a fish wheel.

49-OPPOSE Alaskans should have access to a transport service. Not everyone has an expendable or appropriate boat.

51,52,53-SUPPORT Scientifically based and the only proposals that would directly support and benefit the longevity of these fish runs, especially Chinook salmon.

55-OPPOSE Badly defined proposal, whiny

60,61-OPPOSE This is a very important food source for a lot of Alaskan families

62-OPPOSE whiny, seeks to take food from mouth of Alaskans and instead harvest for own profit

63-OPPOSE Loss of opportunity for Alaskans

65-OPPOSE Redundant

68-Seeks to take away fishing opportunity, unnecessary

70-SUPPORT Safety

71-OPPOSE Misappropriates blame for bad king runs, seeks to destroy livelihoods, anecdotal info with no scientific basis

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

November 26, 2024

Re: **Oppose** Proposals 14, 15, 16, and 17 – PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

I am writing to formally oppose proposals 14, 15, 16, and 17 submitted to the Board of Fish, which would effectively shut down the Prince William Sound (PWS) pelagic trawl fishery. As the captain of the Kodiak-based F/V *Vanguard*, I can attest to the critical importance of this fishery for my business, my crew, and coastal communities across Alaska.

The Vanguard and its crew have spent the majority of their careers fishing in Alaska, and we are fully committed to ensuring the longevity and sustainability of this fishery. The PWS pelagic trawl fishery is an intensely managed fishery, with stringent regulations in place to ensure sustainability. These regulations include mandatory check-in and check-out procedures for fishing vessels, daily catch reporting, a fleet of no more than 6 to 8 vessels operating in the Sound at any one time, and close coordination with fisheries managers.

For many vessels, including the Vanguard, the PWS fishery represents one of the first opportunities of the year to earn revenue. It provides essential income to support our families, our business, and the coastal communities that depend on this industry. In a time when the seafood industry is in crisis and food security is a growing concern in Alaska, shutting down this fishery would be catastrophic not just for fishermen like myself, but for the broader economy of our state.

The Alaska Department of Fish and Game (ADF&G) staff, who are experts in managing this fishery, have expressed opposition to all four proposals and are confident that they can continue to effectively monitor and manage the fishery. The department already has the authority to deploy observers on fishing vessels, and the Vanguard is fully compliant with monitoring requirements. We have carried at-sea observers during federal fisheries when required and are actively participating in the Electronic Monitoring (EM) Program for the federal pelagic pollock fishery, where our cameras are on at all times.

In addition, the PWS pelagic trawl fishery operates under strict bycatch limits, and we are required to retain all pollock, rockfish, and salmon caught. Any catch exceeding the trip limits must be surrendered to the State of Alaska. The ability of the ADF&G to issue Emergency Orders to modify bycatch caps ensures that the fishery remains well-regulated and able to adapt to changing conditions.

Another significant concern with shutting down the PWS pelagic trawl fishery is the potential impact on other important Alaskan fisheries, particularly juvenile pink salmon. Eliminating this fishery could lead to increased predation on pink salmon in the Sound, threatening another vital sector of Alaska's fishing industry.

For these reasons, I strongly oppose proposals 14, 15, 16, and 17. I urge the Board to consider the long-term implications for both the PWS fishery and the broader Alaskan economy, and to reject these proposals in favor of continuing the sustainable management practices that have proven successful in this region.

Sincerely,  
Per Hesberg  
Captain, F/V *Vanguard*

A handwritten signature in black ink, appearing to read "P Hesberg". The signature is written in a cursive, flowing style with a large initial "P" and a long, sweeping underline.

**Submitted by:** Christopher Hinkley

**Community of Residence:** Juneau

**Comment:**

I strongly oppose proposal 51. Cordova is a community built around the commercial fishing industry and this should be the main priority. Fishing time is already substantially limited during early season in order to protect the runs and further limitations would have dire results for fisherman. This proposal is purely for tourism, which makes up a tiny percentage of the income of the community.

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**Submitted by:** Gary Hinzman

**Community of Residence:** Fairbanks

**Comment:**

The top priority for Alaska's fish harvest should be for the residents to feed their families, NOT for commercial fishers to have a stranglehold on the resource.

I oppose proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66,67,68,69,71.

I support proposals 48,51,52,53,58,59,70.

Thank you for this opportunity to share my thoughts and thank you for serving on the board.

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I have fished off and on for about 12 years.  
Mostly the flats

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Tom Hlavnicka

A solid black rectangular box used to redact the signature of Tom Hlavnicka.

Hoonah

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 1, 25, and 26 - OPPOSE**

*-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.*

*-Establish a personal use sablefish fishery in Prince William Sound.*

*-Establish a Prince William Sound groundfish personal use fishery.*

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

**SUPPORT this proposal with CDFU**

**Proposal 2 - SUPPORT**

*Reopen waters closed to the harvest of groundfish in Prince William Sound*

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

**SUPPORT this proposal with CDFU**

**Proposal 3 - SUPPORT**

*Modify Prince William Sound groundfish pot specifications*

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

**OPPOSE this proposal with CDFU****Proposal 5 - OPPOSE**

*Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.*

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

**SUPPORT this proposal with CDFU****Proposal 6 - SUPPORT**

*Allow for release of rockfish in mechanical jig and hand troll fisheries.*

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

**OPPOSE this proposal with CDFU****Proposal 7 - OPPOSE**

*Establish gear specifications for directed lingcod fisheries in Prince William Sound.*

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

### **SUPPORT this proposal with CDFU**

#### **Proposal 8 - SUPPORT**

*Modify the Prince William Sound pacific cod fishery guideline harvest level.*

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

### **SUPPORT this proposal with CDFU**

#### **Proposal 9 - SUPPORT**

*Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.*

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

### **SUPPORT this proposal with CDFU**

#### **Proposal 10 - SUPPORT**

*Modify pot limit in the Prince William Sound Pacific cod fishery.*

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.



Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

### **SUPPORT this proposal with CDFU**

#### **Proposal 13 - SUPPORT**

*Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.*

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

#### **Proposal 19 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

### **SUPPORT this proposal with CDFU**

#### **Proposal 20 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

### **SUPPORT this proposal with CDFU**

#### **Proposal 22- SUPPORT**

*Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.*

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

### **SUPPORT this proposal with CDFU**

#### **Proposal 23 - SUPPORT**

*Prohibit the retention of sablefish from state waters.*

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

### **SUPPORT this proposal with CDFU**

#### **Proposal 27 - SUPPORT**

*Modify rockfish bag and possession limits.*

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

### **OPPOSE this proposal with CDFU**

#### **Proposal 28 - OPPOSE**

*Modify the rockfish area, bag and possession limit.*

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

**Proposal 29 - SUPPORT**

*Create additional provisions for yelloweye rockfish management.*

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

*-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.*

*-Require in season reporting in subsistence and personal use fisheries.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**OPPOSE this proposal with CDFU**

**Proposal 48 - OPPOSE**

*Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.*

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

**SUPPORT this proposal with CDFU****Proposal 49 - SUPPORT**

*Prohibit transport services in the Glennallen Subdistrict.*

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

**OPPOSE this proposal with CDFU****OPPOSE this proposal with CDFU****OPPOSE this proposal with CDFU****Proposals 51, 52, 53 - OPPOSE**

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.*

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 55 - SUPPORT**

*Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.*

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

### **OPPOSE this proposal with CDFU**

#### **Proposal 58 - OPPOSE**

*Amend the Copper River King Salmon Management Plan.*

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

### **OPPOSE this proposal with CDFU**

#### **Proposal 59 - OPPOSE**

*Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.*

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 60, 61 - SUPPORT**

*-Modify the annual limit for the Chitina Subdistrict.*

*-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.*

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

**SUPPORT this proposal with CDFU**

**Proposal 62 - SUPPORT**

*Allow inseason adjustment of the Copper River personal use maximum harvest level.*

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

**OPPOSE this proposal with CDFU****Proposal 63 - OPPOSE**

*Amend the opening date of the Chitina Subdistrict personal use fishery.*

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

**SUPPORT this proposal with CDFU****Proposal 64 - SUPPORT**

*Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.*

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

**SUPPORT this proposal with CDFU****Proposal 65 - SUPPORT**

*Require a weekly permit and inseason reporting in the Chitina Subdistrict.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

### **SUPPORT this proposal with CDFU**

#### **Proposal 66 - SUPPORT**

*Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.*

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

### **SUPPORT this proposal with CDFU**

#### **Proposal 67 - SUPPORT**

*Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.*

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

### **SUPPORT this proposal with CDFU**

#### **SUPPORT this proposal with CDFU**

#### **Proposal 68, 69 - SUPPORT**

*-Prohibit dipnetting from a boat in the Chitina Subdistrict.*

*-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.*

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.



**OPPOSE this proposal with CDFU****Proposal 70 - OPPOSE**

*Extend the lower boundary of the Chitina Subdistrict.*

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

**SUPPORT this proposal with CDFU****Proposal 71 - SUPPORT**

*Prohibit guiding in the Chitina Subdistrict.*

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

**SUPPORT this proposal with CDFU****Proposal 72 - SUPPORT**

*Close sport fishing for salmon based on water temperature in the Gulkana River.*

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

**OPPOSE this proposal with CDFU****Proposal 78 - OPPOSE**

*Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.*

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

### **SUPPORT this proposal with CDFU**

#### **Proposal 79 - SUPPORT**

*Close Main Bay to all fishing during hatchery cost recovery operations.*

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive

access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

### **SUPPORT this proposal with CDFU**

#### **Proposal 80 - SUPPORT**

*-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.* Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

### **OPPOSE this proposal with CDFU**

#### **Proposal 83 - OPPOSE**

*Allow a resident sport angler to use two rods when fishing for salmon.*

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

### **SUPPORT this proposal with CDFU**

#### **Proposal 84 - SUPPORT**

*Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.*

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

**OPPOSE this proposal with CDFU**

**Proposal 85 - OPPOSE**

*Modify the bag and possession limit for coho salmon.*

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

**SUPPORT this proposal with CDFU**

**Proposal 86 - SUPPORT**

*Modify the sport fishing area and season dates in Ibeck Creek.*

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

**SUPPORT this proposal with CDFU**

**Proposal 87 - SUPPORT**

*Modify the sport fishing area and season in a Copper River Delta system.*

We firmly support protections for spawning coho salmon in the Copper River Delta.

**SUPPORT this proposal with CDFU**

**Proposal 88 - SUPPORT**

*Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.*

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly

restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

**Submitted by:** Nicholas Hodges

**Community of Residence:** Fairbanks

**Comment:**

My comments are located in the PDF.

In Short - I am in FAVOR of any and all BANNING of trawling and REDUCING BYCATCH as best we can to further ensure fishing opportunities in the future.

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## ADFG Proposal Comments:

Short Version: PROPOSALS 14/15/16/17 - YES, 46/47/49 - Possibly, 50 - YES, 51- Possibly, 52 - YES, 53 - Confused, 54 - NO, 58 - NO, 60/61 - NO, 62 - possibly, 63 - Possibly, 64 - YES, 65 - YES, 66 - Possibly, 67 - NO, 68/69/70/71/72 - Possibly, 76/77- possibly, 78- Yes, 83 - NO, 84 - YES, 85 - NO,

### **GROUND FISH:**

#### Proposal 14: YES

Reducing/eliminating Pollock Pelagic trawling in PWS waters, in my opinion, drastically increase the number of Chinook and other salmon species, halibut, and rockfish available for other (non trawling) commercial and sport fishing use. There has been way too much bycatch recently with gear that should not be touching the ground but is. While not law, even having the nets be a few feet off the ground is *essentially* draggin the bottom of the ocean floor. Kicking up the ocean floor also destabilizes the ecosystem further and drastically reduces the viability of these parts of the ocean floor that can recover and continue to contribute to our Alaska fisheries. Us Alaskans rely on salmon particularly chinook salmon to provide for our families and communities and many of these Trawlers' employees are not even from Alaska - thus not even contributing to what I believe is called our cyclical economy.

#### Proposal 15: YES

Continuing to reduce bycatch will help to drastically increase the number of Chinook and other salmon species, halibut, and rockfish available for other (non trawling) commercial and sport fishing use. There has been way too much bycatch recently, specifically chinook bycatch. Capping the number regardless of GHL increases ensures good years are not taken away by increased bycatch.

#### Proposal 16: YES

Continuing to reduce bycatch will help to drastically increase the number of Chinook and other salmon species, halibut, and rockfish available for other (non trawling) commercial and sport fishing use. There is good research out there that Shortraker rockfish are being targeted not on purpose but through the use of gear and methods being used to trawl.

#### Proposal 17: YES

If there is one thing I have learned about businesses, it is that without proper regulation/oversight companies can and will cut corners to maximize profits. Thus, it is a no brainer that all trawlers across Alaska, and especially in PWS should be required to have some sort of unbiased observation on site, at all times, for all means of trawling to ensure the CORRECT number of bycatch is being reported. If this proposal is correct and 0% is being observed there has to be some sort of remedy to correct this.

### **Copper River Salmon**

#### Proposal 46 - Possibly

This seems more feasible, 7 days to report harvest.

Proposal 47 - Possibly

Maybe increase to 1-2 weeks. As it stands we do not have to submit until October so it is nice to have at least a little time to report. Maybe if that was adopted we could begin to reduce it to shorter time periods until report is due.

Proposal 49 - Possibly

It does seem weird to have to pay for a subsistence fishery but boat fuel is not cheap.

Proposal 50 - YES

Rivers are only so wide, this is not the ocean. Hot Spots will become more popular because of the use of chartplotters or fish finders.

Proposal 51 - possibly

We should be doing a better job at getting our fish to be more genetically diverse and this can be a helpful way to achieve this goal

Proposal 52 - YES

We should be allowing for better genetics in our early fish as those are the most likely targeted by commercial fishing. This results in uneven stocks, especially our early runs of fish.

Proposal 53 - CONFUSED

We should be ensuring that the early chinook/sockeye are making their way upstream into the furthest upstream tributaries.

Proposal 54 - NO

If you want your fisheries you should be attacking the trawlers and not the sport fisheries.

Proposal 58 - NO

We need as many kings getting upstream even on great years. Let's not do what Russia did pre Covid and increase their limits. I know WE can reduce them but the limits are good as is. Go fish MORE!

Proposal 60/61 - NO

Especially with Valdez shutting down silvers this early fishery really saved my bacon in regards to harvesting the appropriate amount of fish needed to feed me and my family through the winter.

Proposal 62 - Possibly

More research but we are out of time with our ability to make good and lasting changes to these fisheries. Allowing for this could be a last ditch effort to save these fisheries, but is of my opinion that if we do this we are really just helping trawlers acquire more fish as they will continue to pillage our ocean floors



Proposal 63 - Possibly

Am in favor of allowing for change in opening dates if this allows for better genetic variations in and through the copper river basin improving the brood stock.

Proposal 64 - YES

Those that fish the cook inlet personal use fisheries should not be allowed to fish in the Copper River Personal Use Fishery.

Proposal 65: Yes

Would not be very challenging to report on a weekly basis unless you are fishing multiple days in a row during the required change. Maybe making it 1 week after the personal harvest would make it more fair so everyone gets minimum of 7 days in order to report their harvest.

Proposal 66: possibly

This could help achieve hatchery goals but limit the sport fisherman while not addressing things such as commercial trawling.

Proposal 67: NO?

Is this not already law? It is already very challenging to be rock climbing, harnessed, and get a king of the net while keeping the net in the water. This would be easier to do off of a boat.

Proposal 68/69: Possibly

Power boats are a major disadvantage of dip netting especially for those locals without a boat. Further restrictions could really help level the playing/fishing field.

Proposal 70 - Possibly

As a rock climber I already feel like the charters have it easy and allowing an increase in the line of fishing could severely hurt the rock climbing dip netting community.

Proposal 71 - Possibly

I think charters like Hems are good for those who cannot hike down/climb rocks but the price of these charters is astronomically high. I have heard rumors of non-res fishing off of charters but have NO proof of this. I do know non-res have fished off the rocks but from others have heard the charters do a good job ensuring only res dip net in the Copper.

Proposal 72: Possibly

This seems interesting and has good science behind this. While I think more research should be done we are kind of out of time to do more research. This may be a good way to help limit the stress and strain on river fishing for King Salmon.

## **Prince William Sound and Upper Copper and Upper Susitna Rivers Sport**

Proposal 83: NO

There would be less opportunities for those that are unable to secure fishing on a boat.

Proposal 84: YES

Charters continue to increase in number. They should not be allowed to fish while working. It seems weird but maybe not - coming from a sport fisherman not a charter fisherman.

Proposal 85: NO

There was already not enough of a silver salmon return to support the hatchery causing a complete closure of Silvers in Port Valdez. This seems silly to try and pass on a lean year. Maybe on a big/good year this could sound more appealing. This is coming from a BIG sport fisherman in the Port of Valdez.

### **COMMERCIAL FISHING PERMITS, ALLOCATION PLAN AND HATCHERY OPERATIONS (9 PROPOSALS)**

I don't fully understand Proposal 76 & 77. I would be in favor of if it how I read is this: There would NOT be a increase in Pink intake via hatchery/commercial fishing as I believe there are already too many pink fish/hatcheries as is.

Proposal 78 YES

Reducing the pink hatchery is one way we can get away from many locals talking about trawling and instead take a look at what hatcheries can do for the genetic makeup of the PWS salmon. Especially on a year like 2024 where there was a large reduction in both Pink and Silver Salmon return this year.

PROPOSALS 14/15/16/17 - YES, 46/47/49 - Possibly, 50 - YES, 51- Possibly, 52 - YES, 53 - Confused, 54 - NO, 58 - NO, 60/61 - NO, 62 - possibly, 63 - Possibly, 64 - YES, 65 - YES, 66 - Possibly, 67 - NO, 68/69/70/71/72 - Possibly, 76/77- possibly, 78- Yes, 83 - NO, 84 - YES, 85 - NO,

Nicholas Hodges

**BOF Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Meeting  
December 10 - 16, 2024**

Jacki Holzman



Anchorage, AK 99502

**Proposal 45 oppose**

Allowing subsistence fishing in closure areas while not allowing personal use is discriminatory to other users attempting to procure fish. The rationale given in the proposal is that it is okay for subsistence users because they are limited to five King salmon per household. Using that same rationale, personal use fishers should be allowed the same access since they are limited to only one King salmon per year.

**Proposal 48 support**

This allows access to the fishery for those who do not have the privilege of access to the shore or own a boat.

**Proposal 49 oppose**

This proposal unduly restricts those for outside the area from access to the fishery. If this is passed then subsistence users in all other harvest areas of the state should also be restricted to hunting/fishing only in the specific geographical area where they live. This proposal is discriminatory.

**Proposal 50 oppose**

Depth finders, chart plotters, etc. are generally all packed in the same unit. They are safety gear that allows boaters to more safely navigate. If a decision is made to restrict them in this fishery, it makes sense also to prohibit them in all other fisheries. The escapement goals will not be helped by implementing this proposal and it is unnecessary and will increase the risk of accidents and damage to boats on the river.

**Proposal 55 oppose**

This ostensibly promotes “shared conservation” between upriver and down river commercial fishing. It does not. The author conflates commercial fishing with guide services and wants to shut down guides when the commercial fleet has restrictions while saying the rationale is based on coordination with others and historical data, though no data is presented. The facts are that the commercial fishery landed over 1.3 million reds and 8,200 kings last year compared to the

personal use fishery taking 160,000 reds and 200 kings. This proposal does not increase King escapement.

**Proposal 58 support**

This will better allow the department to manage the escapement goals on both ends of the escapement range.

**Proposal 60 oppose**

This puts an undue restriction on personal use households. Personal use represents less than 10% of the commercial harvest and who knows how little of the subsistence catch. This proposal requests a 20% reduction of the personal use limit to address a 9% “over catch” issue that is most likely not recurring. This puts an undue hardship on personal use households as opposed to spreading the pain over all users.

**Proposal 61 oppose**

This will work a hardship on a vast number of personal use households for no appreciable gain in increasing escapement goals. This will essentially limit head of household limits until later in the season. Those who fish early in the season will need to make two trips instead of one. In one of the earlier proposals, it was stated that it didn’t matter when subsistence users caught their fish because they were limited to 5 kings. The rationale for both personal and subsistence should be the same. It doesn’t matter when the fish are caught, the limit is the limit and this proposal will have no discernible effect on overall escapement.

**Proposal 62 oppose**

This is unfairly punitive to the personal use fishery. In reality any impact of the personal use fishery is negligible compared to the subsistence and commercial catch. While I can appreciate the challenges faced by the commercial fishing interests, it makes no sense to hamstring personal use households when the harvest is less than 10% of the commercial fleet’s harvest. And who knows what a small percentage of the subsistence users’ harvest.

**Proposal 65 oppose**

Proposal 47 addresses this. It is not a good idea. Restricting permits to one week accomplishes nothing for the fishery. It makes it more work for personal use households to plan and complete their fishing trips. If something delays their trip they need a new permit. The earlier proposals regarding in season reporting can be accomplished without this proposal.

**Proposition 68 oppose**

This proposal will make personal use fishing more dangerous. Unlike the Kenai and Kasilof rivers the Copper River does not have long sandy beaches at the locations favorable for dip netting, many of them are along cliffs and rocky edges of the river. The adverse impacts of this proposal would overwhelmingly be experienced by seniors and those with physical impairments. This is unfair and discriminatory.

**Proposition 69 oppose**

Establishing more restrictions on dip netting from boats is unnecessary. Ultimately, escapement goals are what matters (It is ironic that the author of this proposal earlier proposed ways to make the commercial fleet more efficient in catching fish and another author of a proposal asking for permit stacking has the same name). This proposal calls for a restriction on dip netting practices with no apparent connection to, or impact on, sustainability of the fishery.

**Proposal 70 support**

This proposal will will increase the safety of the fishery. Opening this area to dip netting will relieve congestion on the river during times that many users are present and will reduce the chances for collisions, injuries, and potential loss of life due to accidents.

**Submitted by:** James Honkola

**Community of Residence:** Cordova, AK

**Comment:**

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

I respectfully ask you to consider my proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting. I am an Area E commercial fishermen. I am a 3rd generation Area E commercial fisherman, born and raised in Cordova, Alaska. I have crewed in drift gill net and purse seine fisheries since 12 years old with my family. I bought my own drift permit and vessel in 2012 after graduating college in 2010 with a BS in civil engineering. During last 3 years I have also captained a seine vessel in Prince William Sound. As a father of 4 I remain dedicated to supporting this local fishing community and using sound science to manage our fisheries to benefit all users groups for generations to come.

James Honkola

---

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am a 3rd generation Area E commercial fisherman, born and raised in Cordova, Alaska. I have crewed in drift gill net and purse seine fisheries since I was 12 with my family. I bought my own drift permit and vessel in 2012 after graduating college in 2010 with a BS in civil engineering. During the last 3 years I have also captained a seine vessel in Prince William Sound. As a father of 4 I remain dedicated to supporting this local fishing community and using sound science to manage our fisheries to benefit all user groups for generations to come.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

James Honkola

A solid black rectangular box used to redact the signature of James Honkola.

Cordova

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU



**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I grew up fishing commercially with my dad in Area E and then bought into gillnetting in 2014. I serve on the CDFU board, the PWSAC board, NVE's natural resource committee, and ASMI's salmon committee.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Hayley Hoover

[REDACTED]

Cordova/Anchorage

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 1, 25, and 26 - OPPOSE**

*-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.*

*-Establish a personal use sablefish fishery in Prince William Sound.*

*-Establish a Prince William Sound groundfish personal use fishery.*

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

**SUPPORT this proposal with CDFU**

**Proposal 2 - SUPPORT**

*Reopen waters closed to the harvest of groundfish in Prince William Sound*

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

**SUPPORT this proposal with CDFU**

**Proposal 3 - SUPPORT**

*Modify Prince William Sound groundfish pot specifications*

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

**OPPOSE this proposal with CDFU****Proposal 5 - OPPOSE**

*Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.*

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

**SUPPORT this proposal with CDFU****Proposal 6 - SUPPORT**

*Allow for release of rockfish in mechanical jig and hand troll fisheries.*

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

**OPPOSE this proposal with CDFU****Proposal 7 - OPPOSE**

*Establish gear specifications for directed lingcod fisheries in Prince William Sound.*

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

### **SUPPORT this proposal with CDFU**

#### **Proposal 8 - SUPPORT**

*Modify the Prince William Sound pacific cod fishery guideline harvest level.*

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

### **SUPPORT this proposal with CDFU**

#### **Proposal 9 - SUPPORT**

*Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.*

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

### **SUPPORT this proposal with CDFU**

#### **Proposal 10 - SUPPORT**

*Modify pot limit in the Prince William Sound Pacific cod fishery.*

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.



Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

### **SUPPORT this proposal with CDFU**

#### **Proposal 13 - SUPPORT**

*Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.*

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

### **SUPPORT this proposal with CDFU**

#### **Proposal 19 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

### **SUPPORT this proposal with CDFU**

#### **Proposal 20 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

### **SUPPORT this proposal with CDFU**

#### **Proposal 22- SUPPORT**

*Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.*

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

### **SUPPORT this proposal with CDFU**

#### **Proposal 23 - SUPPORT**

*Prohibit the retention of sablefish from state waters.*

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

### **SUPPORT this proposal with CDFU**

#### **Proposal 27 - SUPPORT**

*Modify rockfish bag and possession limits.*

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

### **OPPOSE this proposal with CDFU**

#### **Proposal 28 - OPPOSE**

*Modify the rockfish area, bag and possession limit.*

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

### **SUPPORT this proposal with CDFU**

#### **Proposal 29 - SUPPORT**

*Create additional provisions for yelloweye rockfish management.*

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 31 - SUPPORT**

*Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.*

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

### **SUPPORT this proposal with CDFU**

#### **Proposal 32 - SUPPORT**

*Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.*

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING

SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

### **OPPOSE this proposal with CDFU**

#### **Proposal 33 - OPPOSE**

*Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.*

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

### **SUPPORT this proposal with CDFU**

#### **Proposal 34 - SUPPORT**

*Repeal the Registration Area E Tanner crab harvest strategy.*

The current Area E Tanner crab harvest strategy is unworkable, as it relies too heavily on trawl surveys and does not allow for a fishery in the majority of the PWS area. At the 2021 meeting the Area E Tanner crab harvest strategy was passed as a placeholder that allowed for a small fishery in 2022. ADFG assured fishermen that a more holistic Tanner crab harvest strategy was forthcoming, and would be presented for the 2024 meeting.

CDFU encouraged fishermen to participate in the Tanner crab test fisheries over 4 years because the ADFG stated that they needed this data to create a harvest strategy for PWS. Instead, ADFG gave us a harvest strategy which did not use any test fishery data. This created no possibility of opening some of the best fishing grounds found in the test fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 35 - SUPPORT**

*Modify the harvest strategy for Prince William Sound Tanner crab.*

At the 2021 BOF meeting, ADFG and fishermen worked together at the last minute to create a flawed PWS Tanner crab management plan. The BOF, ADFG and CDFU expressed interest in working together to create a more workable plan before the 2024 BOF meeting.

CDFU reached out to ADFG multiple times in the last year to collaborate on proposals related to PWS Tanner crab but received extremely limited input. Proposal 35 is our best attempt to create a workable harvest strategy for PWS Tanner crab that will result in a sustainable fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 36 - SUPPORT**

*Increase the pot limit in the Prince William Sound Tanner crab fishery.*

At the 2017 BOF meeting the pot limit was reduced from 75 pots to 30 pots. This was part of a large proposal by the ADFG to establish a new harvest strategy for PWS Tanner crab. No justification for the reduction was given by ADFG in their proposal or in ADFG staff comments. There was not public support for the reduction.

Pot limits should be set with input from the fleet. The pot limit reduction passed as part of a total rewrite of the Tanner crab management strategy. That harvest strategy was flawed in many ways, and working through that distracted from input on the pot reduction section.

Higher pot limits reduce handling of immature and female crabs because it increases soak times. This allows time for small crab to leave the pot via the escape rings. As we have in many different areas and other fisheries, Fishermen will ask the BOF to lower the pot limit if fishery participation increases and crowding becomes an issue from too many pots.

The small pot limit makes prospecting PWS exceptionally time consuming and expensive. Since the fishery reopened, there is a large portion of PWS, especially the outside waters, that have not been explored. Tanner crabs move in schools. They are easily missed when too few pots are spread over too large an area. This pot limit is damaging to the resource because it increases the handling of undersized crab. It also is economically damaging to fishery participants because it increases the bait, fuel, and time required to execute the fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 37 - SUPPORT**

*Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.*

ADFG does not need the ability to adjust pot limits to manage the fishery. For instance, the length of salmon seines isn't adjusted from season to season based on run size. The daily reporting requirement in regulation allows ADFG to closely monitor the pace of the fishery and close it when there is a danger of exceeding the GHL. There is no regulation allowing adjustment to pot limits by ADFG for Southeast or Kodiak, instead static pot limits are set by the BOF. In 2022 ADFG utilized this regulation to lower the pot limit to 25. This was a significant reason the fleet was unable to harvest the GHL that season.

### **SUPPORT this proposal with CDFU**

#### **Proposal 38 - SUPPORT**

*Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.*

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 39 - SUPPORT**

*Establish season dates for a commercial Golden King crab fishery.*

Southeast Alaska has a booming Golden King crab fishery without a fishery independent assessment.

“The Alaska Department of Fish and Game (department) evaluates stock status and establishes guideline harvest levels (GHLs) for each management area using fishery dependent data including: catch per unit of effort (CPUE), harvest and biological information (carapace length, weight, and maturity) from dockside sampling landings. No population abundance estimates are obtained for GKC stocks.” -from the Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season

Our fishermen have seen ample evidence of Golden King crab abundance. ADFG has no assessment for Golden King crab in PWS and to date has stated no intention of developing the harvest strategy current regulation stipulates. It seems that this fishery will stay closed forever without action by the BOF.

### **SUPPORT this proposal with CDFU**

#### **Proposal 40 - SUPPORT**

*Adopt a harvest strategy for golden king crab in Prince William Sound.*

Golden King crab fisheries must depend on CPUE in the commercial fishery to set its GHL, because there is no good way to survey. This proposed harvest strategy is similar to the one being used with success in Southeast.

As the fishery develops and distinct populations of Golden King crab are discovered, it will be prudent to break the area into districts. In the meantime, the statistical areas that are already in regulation allow for a reasonable starting point until the next BOF meeting cycle.

Local PWS economies are struggling following years of depressed fish prices, increased overhead costs for operations, and increased efforts of time for static harvests. It is imperative that the BOF direct ADFG to open these small scale fisheries, because they are simply not being proactively opened without BOF direction.

### **OPPOSE this proposal with CDFU**

#### **Proposal 42 - OPPOSE**

*Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.*

Crab fisheries close during the summer months because this is when crab are molting and most susceptible to mortality from handling.

We oppose the opening of a sport fishery for King or Tanner crab without also opening a commercial fishery.

### **Proposal 43 - SUPPORT**

*Establish a directed octopus fishery in Prince William Sound.*

In recent years the GHL for PWS octopus has not been harvested but fishermen are interested in an octopus fishery.

### **SUPPORT this proposal with CDFU**

### **SUPPORT this proposal with CDFU**

### **Proposal 46, 47 - SUPPORT**

*-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.*

*-Require in season reporting in subsistence and personal use fisheries.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

### **OPPOSE this proposal with CDFU**

### **Proposal 48 - OPPOSE**

*Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.*

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence



fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

**SUPPORT this proposal with CDFU**

**Proposal 49 - SUPPORT**

*Prohibit transport services in the Glennallen Subdistrict.*

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 51, 52, 53 - OPPOSE**

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.*

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of

695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 55 - SUPPORT**

*Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.*

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

#### **Proposals 56 + 57 – OPPOSE**

*-Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders*

*-Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery*

Contrary to the authors' statements on opportunity, this will further limit access to this fishery and make it more difficult for new entrants to obtain permits and participate if a single permit holder can hold two permits. At least initially, there will not be less gear in the water. Instead, the dormant or low effort permits will be sold to the most productive fishermen running the largest, most efficient vessels. There will be more gear in the water and more significantly, the most productive boats in the fishery will have more gear to fish. This could have a drastic effect on the harvests of other drift permit holders that only fish one permit and could have a significant effect on the harvest levels of setnet permit holders.

### **OPPOSE this proposal with CDFU**

#### **Proposal 58 - OPPOSE**

*Amend the Copper River King Salmon Management Plan.*

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed

manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**OPPOSE this proposal with CDFU**

**Proposal 59 - OPPOSE**

*Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.*

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 60, 61 - SUPPORT**

*-Modify the annual limit for the Chitina Subdistrict.*

*-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.*

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

**SUPPORT this proposal with CDFU**

**Proposal 62 - SUPPORT**

*Allow inseason adjustment of the Copper River personal use maximum harvest level.*

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

**OPPOSE this proposal with CDFU**

**Proposal 63 - OPPOSE**

*Amend the opening date of the Chitina Subdistrict personal use fishery.*

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

**SUPPORT this proposal with CDFU**

**Proposal 64 - SUPPORT**

*Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.*

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

**SUPPORT this proposal with CDFU**

**Proposal 65 - SUPPORT**

*Require a weekly permit and inseason reporting in the Chitina Subdistrict.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

#### **SUPPORT this proposal with CDFU**

##### **Proposal 66 - SUPPORT**

*Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.*

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

#### **SUPPORT this proposal with CDFU**

##### **Proposal 67 - SUPPORT**

*Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.*

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

#### **SUPPORT this proposal with CDFU**

##### **SUPPORT this proposal with CDFU**

##### **Proposal 68, 69 - SUPPORT**

*-Prohibit dipnetting from a boat in the Chitina Subdistrict.*

*-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.*

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased

commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

**OPPOSE this proposal with CDFU**

**Proposal 70 - OPPOSE**

*Extend the lower boundary of the Chitina Subdistrict.*

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

**SUPPORT this proposal with CDFU**

**Proposal 71 - SUPPORT**

*Prohibit guiding in the Chitina Subdistrict.*

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

**SUPPORT this proposal with CDFU**

**Proposal 72 - SUPPORT**

*Close sport fishing for salmon based on water temperature in the Gulkana River.*

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

### **OPPOSE this proposal with CDFU**

#### **Proposal 78 - OPPOSE**

*Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.*

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

### **SUPPORT this proposal with CDFU**

#### **Proposal 79 - SUPPORT**

*Close Main Bay to all fishing during hatchery cost recovery operations.*

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

### **SUPPORT this proposal with CDFU**

#### **Proposal 80 - SUPPORT**

*-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.* Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

### **SUPPORT this proposal with CDFU**

#### **Proposal 81 - SUPPORT**

*Modify the area open to sport fishing near the Main Bay Hatchery.*

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

### **OPPOSE this proposal with CDFU**

#### **Proposal 83 - OPPOSE**



*Allow a resident sport angler to use two rods when fishing for salmon.*

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

**SUPPORT this proposal with CDFU**

**Proposal 84 - SUPPORT**

*Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.*

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

**OPPOSE this proposal with CDFU**

**Proposal 85 - OPPOSE**

*Modify the bag and possession limit for coho salmon.*

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

**SUPPORT this proposal with CDFU**

**Proposal 86 - SUPPORT**

*Modify the sport fishing area and season dates in Ibeck Creek.*

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

**SUPPORT this proposal with CDFU**

**Proposal 87 - SUPPORT**

*Modify the sport fishing area and season in a Copper River Delta system.*

We firmly support protections for spawning coho salmon in the Copper River Delta.

**SUPPORT this proposal with CDFU**

**Proposal 88 - SUPPORT**

*Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.*

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

**SUPPORT this proposal with CDFU**

**Proposal 96 - SUPPORT**

*Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.*

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

**SUPPORT this proposal with CDFU**

**Proposal 97 - SUPPORT**

*Reduce the minimum herring spawning biomass threshold.*

Biomass thresholds are normally set based on a population's unfished size. There are now 30 years of population estimates where no fishery occurred. This data should be used to set fishery limits and exploitation rates.

The PWS and Gulf of Alaska ecosystems have changed drastically in the last 30-50 years, and will continue to change. There is no reason to keep the herring fishery closed until it achieves those historical population numbers. Environments are ever-changing and managers need to have an ability to adapt to outdated management strategies.

**SUPPORT this proposal with CDFU**

**Proposal 98 - SUPPORT**

*Align Prince William Sound herring and salmon management area descriptions.*

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

**SUPPORT this proposal with CDFU**

**Proposal 99 - SUPPORT**

*Define commercial herring fishery districts in Prince William Sound.*

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

**SUPPORT this proposal with CDFU**

**Proposal 100 - SUPPORT**

*Adopt a Kayak Island District herring management plan.*

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

**SUPPORT this proposal with CDFU**

**Proposal 102 - SUPPORT**

*Allow commercial fishery permit holders to harvest herring for the own use as bait.*

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I've fished Prince William Sound for 28 years. From 1997-2007 I seined and long-lined. From 2008 to now I have tendered for salmon in Area E and long-lined.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Chris Hottinger

[REDACTED]

Cordova, Alaska

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU



**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:**

SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

**Submitted by:** Anita Howard

**Community of Residence:** Lake Louise

**Comment:**

I do not believe that increasing the limit on burbot on Lake Louise is in the best interest of the fish or the fisherman. This population was badly depleted in I believe the 70s and has never truly recovered. LL is too easy to access in winter especially and with all the newer technology, the chances are, the population will plummet.

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**Submitted by:** Edmund Howell

**Community of Residence:** Highland, Utah

**Comment:**

Comments related to proposals 86, 87, and 88. I am against proposal 86. I am against proposal 87. I am against proposal 88. My opposition is detailed in the attached PDF document. I have also included some general comments for the Board's consideration relating to sportfishing in the Cordova area. Please see attached.

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**Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526**

**RE: Comments concerning Proposals 86, 87, and 88 by the 2024 meeting of the Alaska Board of Fisheries for the Prince William Sound and Upper Copper River and Upper Susitna River**

**Proposal 86 – Against**

**Proposal 87 – Against**

**Proposal 88 - Against**

**General Comments and Suggestions relating to Sportfishing in the Cordova Area**

My wife and I have traveled to Cordova every year, for the past ten years, to fish for silver salmon. I started fishing in Cordova in 2004. I would like to share my concerns about the management practices that are currently in place as well as those that are being proposed for 2025 and beyond. My experiences are anecdotal, because everyone's experiences differ, based on fish migration patterns, expertise and just plain luck, but nevertheless, our many years of sportfishing in the area has given us some degree of local knowledge. Though not every year has been abundant with catchable fish, 2024 was the worst year in our history of fishing in the Cordova area.

In 2024, we fished from September 16<sup>th</sup> to September 21<sup>st</sup>. We fished at least seven hours each of those six days, but only harvested total of five fish each. Of those, three each were harvested on Monday the 16<sup>th</sup>. I did not harvest a single fish on Tuesday, Wednesday, Thursday or Saturday. We fished multiple locations including some more remote locations that involved some hiking and travel. Most of our fishing was done downstream from the Copper River Highway and included the Eyak River, Ibeck Creek, Alaganik Slough, as well as other small tributaries.

We are accustomed to and recognize that there are factors that impact fishing. Run timing, river flow rate, water clarity and other weather conditions all influence the ability to catch fish. These are things that cannot be controlled. We have also become accustomed to the impact that commercial openers have on sport fishing in the area. We have learned that the day or two after a commercial opener will be difficult on the main waterways, because most of the fish that we catch are moving, migrating fish. On the days following openers, we find our best success higher upriver where the fish are less transient and are resting or migrating to spawn. We fish in these areas much less when fish are entering the rivers and accessible below the highway.

It has been our experience that the commercial fishermen have become so efficient and expert that they harvest, on commercial openers, nearly all the available fish that are staging, near the mouth of main waterways, for their runs upriver. It typically takes a day or two, and some tides before the we find fish moving again. I don't fault the commercial fishermen, but they have become very good at maximizing their harvest, and their nets allow very few fish to escape.

In the week we were in Cordova on September, 2024, there were two 36-hour commercial openers in the week. One on Monday and Tuesday, and another on Thursday and Friday. Despite significant rain on Tuesday, the Eyak River and other areas, from a water clarity standpoint, remained fishable. There may have been other mitigating factors, but between the two commercial openers, there were very few fish entering the river system. Not only did we not catch fish, but we saw very few groups of fish. We avoided some of the alternative places to fish because these areas were more crowded than usual due to the lack of fish in the river areas below the Copper River Highway.

I would have discounted the effect that the commercial opener might have had on the sportfishing, and blamed it on other factors, but it was reported that commercial fishermen harvested over six thousand silver salmon from the Copper River Basin on the Monday, September 16<sup>th</sup>, 36 hour opener. With this harvest, there weren't many fish left for the sportfishermen. Then, just 36 hours later, there was another 36 hour opener. These openers, combined with other natural factors, made sportfishing very difficult.

In saying these things, I am not criticizing the commercial fishermen. They have a lot of expenses too, and they are just doing the best they can to make a living. But it is our observation that they have become very expert and efficient in capturing the bulk of the staging salmon as they prepare to move into the river systems, allowing very minimal escapement and fish to spawn.

This leads me to a few observations. Even though escapement quotas may have been achieved earlier in the season, two 36-hour openers in a single week, created an undue burden on sportfishermen. A weeklong trip for my wife and I cost between \$5,000 and \$6,000, plus food and gear. The run time for silver salmon, lasts just a few weeks, but during that time, sportsmen contribute a great deal to the local economy in taxes, lodging, meals, and charter fees. We would hope that there would be at least a reasonable opportunity to catch a few more fish since we save, prepare and look forward to this trip, all year. Sportfishermen catch a small percentage of the migrating fish, compared to commercial fishermen. Nets are more effective in capturing and blocking the bulk of the migration, than a few fishermen using lures or flies. Many fish, after entering the river systems, do get past sportfishermen, and continue to the spawning grounds.

The fact is that the commercial fishermen and the sportfishermen are fishing for the same potentially spawning fish. The commercial fishermen fish for them in salt water as they stage near the river mouths. The sportfishermen target fish as they enter and move up their freshwater streams. The commercial fishermen take thousands while the sportfishermen take approximately 7 percent or less. But, harvested fish are the same mature spawning fish regardless of who catches them or where they are caught. The biggest difference is that a much greater and more efficient harvest is done by those using nets. Net fishermen allow few fish to enter the fresh water and eventually spawn while the majority of fish who actually enter the fresh water, make it to the spawning beds even though they do have to run past fishermen using hooks.

I make the following suggestions relating to sportfishing in the Cordova Area:

1. Reconsider the closure of any additional sport fishing grounds in the Cordova area. Let the areas, that are not already closed, remain accessible to allow sportfishermen places to go when the main rivers, creeks and sloughs below the Copper River Highway are not fishable.

2. Increase the escapement targets for the Cordova area fisheries. This single action would affect both the commercial and the sport fishermen, but it would allow more naturally spawning fish to reach the areas upriver that are already protected.
3. Consider restrictions on where commercial fishermen could set nets to allow some escapement during commercial openers. The geographic structure around Cordova allow commercial fishermen to create an effective barrier to almost any fish entering the Eyak river system and other area streams during commercial openers. Egg island and the adjacent passage near the mouth of the Eyak river is one example of the geographic structures where fishermen almost completely block river access to potential spawning fish.
4. After September 15<sup>th</sup>, there are normally still many fish entering the rivers to spawn. Please organize the structure of commercial openers to allow for at least some consideration of sportfishermen and to allow for additional escapement to promote the future of both commercial and sportfishing opportunities.

#### **Relating to Proposals #86 and #87:**

(#86) It is my assertion, that the effect of sportfishing, on spawning fish numbers, in areas upstream from the Copper River Highway is minimal due to the number of anglers that can and will hike to many of these locations, but the closure of these areas is still very restrictive for those that are willing to make the extra effort. Only a few anglers hike the Ibeck beyond the first mile, anyway. Upper Ibeck Creek is already closed beyond the markers that are approximately 3 miles upriver from the Copper River Highway.

(#87) There are a few small areas above, but adjacent to the highway, that allow fishermen some success, but these are small and space is limited. The Upper Alaganik, including the 18 Mile Hike, is also one of the few places that can be fished when areas below the highway are not fishable.

(#86 and #87) Further closures of available fishing areas unfairly restrict places that individuals can fish in the Cordova area. The proposed closures for 2025 create additional crowding of popular accessible fishing areas and diminish the overall fishing experience for sportfishermen. With natural factors such as weather and stream conditions, coupled with competition with commercial fishermen, there are simply few places left for the sport fishermen to go at certain times, within the season, to attempt to legally catch or harvest silver salmon. Most of the areas upriver from the Copper River Highway, require more effort to fish, but these are the only areas available to fish when areas below the highway are unavailable or devoid of fish due to commercial openers, excessive high water, or glacial silt clouded stream and river conditions. The Eyak River, Alaganik, and Ibeck Creek are accessible and would be the chosen places to fish for many anglers but are inaccessible or ineffective places to fish when river conditions or commercial openers don't make fishing there effective.

#### **Comments relating to Proposal #88:**

I firmly believe in science and research as the basis for fish and game regulations. Therefore, it might make sense to consider the quantity of actual fish that would be removed from the area water system by sportfishermen, if this proposal were not enacted. This proposal should not be enacted as an emotional issue by commercial fishermen which in effect says, "if we (commercial fishermen) are going to be punished by the closure of commercial fishing, then the sportfishermen should be punished, as well." Bag limit reduction of a few hundred fish taken by sportsmen has a vastly different effect on the fishery than the harvest of several thousands of fish by the commercial industry on each opener. Nevertheless, if scientific research indicates that escapement quotas are way below target, then bag limit reduction for the sportfishermen might also be justified.

The criteria should just not be based on whether the commercial fishery is closed nor on how many days it has been closed. Rather it needs to be based on the overall escapement numbers and the effect commercial fishing and sportfishing have on meeting the escapement target. If the commercial fishermen take 93% of the harvest and the sportfishermen the other 7%, it would appear that all three new proposed restrictions (86, 87, and 88) might be targeting just the minor party in this equation without making much change in addressing the number of fish who are able to successfully spawn.

Sincerely,

Edmund K. Howell

[REDACTED]

Highland, UT 84003

[REDACTED]

Alaska Board of Fisheries

November 11, 2024

RE: Comments concerning Proposals 87, and 88 by the 2024 meeting of the Alaska Board of Fisheries for the Prince William Sound and Upper Copper River and Upper Susitna River

My husband and I greatly enjoy our fall fishing trips to Cordova. We plan for and look forward to them all year. We are both older and a little limited in our physical abilities, but still love to fish. There are limited places to fish in the Cordova area, and further restrictions increase crowding of the available areas and further limit fishing opportunities for people like us.

Proposal 87 Against

Limiting access to waters one mile above the confluence of the Alaganik Slough greatly limits access to some of the few areas that are easily accessible for those without a boat and for those who are older or somewhat mobility impaired. We are senior citizens and roadside areas near the Copper River Highway provide some of the few places that we can access. These places also provide a place to fish when fishing is difficult on the lower river and stream waterways due to commercial openers, cloudy river conditions or flood swollen rivers. These areas, that are at least somewhat accessible for the mobility impaired, would be closed if this proposal were adopted.

There are limited places to fish in the first mile from the confluence of the Alaganik, and some of these places are not very safe or easy to fish due to tidal flow, and they are not very accessible, without a boat. It is easy for fishermen, who walk in, to get trapped by raising tides in the first mile, and this lower part of the slough is also greatly affected by rain and silt from run off.

Proposal 88 Against

In 2024, a basic week long fishing trip to Cordova costs \$5,000 or more, per couple, including lodging and food. These trips must be booked many months in advance. These trips are booked long before final fishing limits and emergency orders are finalized. The sport fishermen dollars are an asset to the local community in the form of taxes, lodging, charter fees, and food purchases. Reduced limits make these trips less desirable and more impractical.

The sportfishermen harvest a small overall percentage of the harvested salmon. The reduction of sportfishing limits would have a minimal effect on overall escapement numbers compared to the effect caused by a single commercial opener. Why penalize sportfishermen when their effect on the total escapement is so much less significant. On a typical day in mid to late September, there are probably not more than 200 sportfishermen in the entire Cordova area, and many of these are crowded in places near the Copper River Highway.

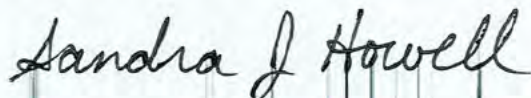
A reduced limit of one or two fish per day greatly reduces fishing opportunities and makes the vacation cost impractical. The primary reason for tourism in Cordova is the fishing opportunity.



Cordova is beautiful, but without fishing opportunities, there are limited things to do in September in Cordova.

As silly as it sounds, the only way to equalize the effect on escapement between commercial and sport fishermen would be to limit the commercial fishermen to three fish per day, each, just like the sportfishermen. It truly would be impractical for the commercial fishermen, who take the vast majority of the annual harvest and need to harvest more fish to cover their costs and make some profit. But further reduced limits are also impractical for sportfishermen, who also spend significant dollars for the privilege of fishing to take only an estimated 7% of the overall harvest, even with full 3 fish per day limits. In overall fish escapement considerations, what increased number of fish per week would actually make it to the spawning grounds if the limits were reduced by one or two fish per day for sportsmen and women, considering that fact that many fishermen don't always catch full daily limits, anyway? Trying to make both the commercial fishermen and sportfishermen equally responsible for reaching escapement targets by reducing sportfishing limits does not make sense because the impact on escapement from sportfishing is not equal with the impact from commercial fishermen.

Thank you for allowing us to comment on these proposals.



Sandra Howell

[REDACTED]  
Highland, UT 84003



**Submitted by:** Jestin Hulegaard

**Community of Residence:** Ridgefield

**Comment:**

Hatchery pinks are having a scientifically proven negative impact on the fitness of wild fish originating from Alaska to California. The economic value is being paid for by our most iconic species, Chinooks, which are getting smaller and having a harder time surviving in the ocean. We need to take action soon or we will lose them.

---

**Submitted by:** Jestin Hulegaard

**Community of Residence:** Ridgefield

**Comment:**

I support Proposal 14, 15, 16, 17, 78. Our chinook population is suffering along the entire West Coast. We have to take drastic action to preserve this iconic species. Trawl fishing is unsustainable and irreparably damages every single fishery it has ever been used. The bycatch is horrible and ludicrous. Hatchery pink salmon are also a threat to survival of chinook. With rising pressure from climate change, the North Pacific has more salmon than ever, mostly due to hatchery fish. Studies have shown the immense amount of hatchery pinks depress the availability of food for chinook. Again, we must take action or chinook will continue to shrink in size and population. How devastating if the North Pacific becomes a fish farm for 5 lb fish going to China.

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**Andrew Hull - Area E commercial drift gillnet fisherman and permit holder****Proposals 51, 52, 53 - Oppose**

As a permit holder and participant in the Area E commercial drift gillnet fisheries, I strongly oppose proposals 51, 52, and 53. These proposals limit ADFG's flexibility to best manage the commercial drift gillnet fishery according to the highly variable run timing of Copper River sockeye returns. Early season fishing openers are a valuable tool to fisheries managers by providing indices of fish abundance outside the river system, prior to the appearance of fish at the Miles Lake sonar site.

Run timing of Copper River sockeye is highly variable, with the midpoint in the sockeye return (date at which 50% of cumulative escapement is reached) differing by over 2 weeks during the past 10 years (Data obtained from ADFG website). The requirement of cumulative management objectives (proposals 51 and 53) and daily management objectives (proposal 52) being met offers too rigid of a framework for fisheries managers to account for the variability in run timing that is seen from season to season.

There are significant lag times between when fish congregate at the mouth of the Copper River to when fish are counted further upstream at the sonar site. Prolonged early season closures can lead to large buildups of fish that vastly exceed daily management objectives once they push upriver. For example, in 2024 drift gillnet fishing was limited to a single 12 hour commercial fishing opener in a 15 day span between May 24th and June 7th. Subsequently, the Miles Lake sonar site recorded passage of 154,062 fish between June 8th-10th, compared to a combined daily management objective of 38,224 fish for those three days. The midpoint in the 2024 sockeye return did not occur until June 23rd. (Data obtained from ADFG website)

By relying solely on sonar counts and daily/cumulative management objectives to govern early season fishing, these proposals restrict the tools available to ADFG to account for run timing variability and adequately distribute fishing effort over the early season. In addition to leading to over escapement, these proposals would cause significant loss of economic opportunity to Area E drift gillnetters by limiting early season harvest when market conditions are strongest.

**Submitted by:** Alison Humphrey

**Community of Residence:** Chugiak

**Comment:**

I adamantly OPPOSE Proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71 and Fully SUPPORT Proposals 48,51,52,53,58,59,70.

The proposals I staunchly OPPOSE listed above are clearly intended to benefit the FEW along with the out-of-state commercial fishing industries while depriving / limiting the MANY i.e the citizens of Alaska to include its 54K Veterans the benefits they are eligible for as residences of this great state. Additionally, the proposals we oppose clearly infringes on the rights / privileges on the 54K Veterans who call Alaska their home which they proudly Served to protect.

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**Submitted by:** Mike Huston

**Community of Residence:** Eagle River

**Comment:**

Proposal 16. Close the trawling in prince william sound. It's a crime it's even allowed. They destroy every fishery they exploit.

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11/26/2024

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Stoian Iankov. My family and I own and operate the F/V Michelle Renee. Our vessel is based out of Kodiak and we generate the overwhelming majority of our income from the trawl fisheries in the Gulf of Alaska. In July and part of August, we do salmon tendering in Prince William Sound and Bristol Bay, wherever needed.

We are a GOA vessel and there is no other place to go to. My son is the Captain of the boat and is a Kodiak resident, we employ 5 crewmen, and four are Alaska residents. And they have families.

Kodiak and its infrastructure relies heavily on the trawl fleet. We do all the necessary work for the vessel in Kodiak and the only time we leave is when what we need is not available. This has been a difficult year. Low ex-vessel prices are the same as in the 1980s. Processors not able to fulfil their orders. This is causing a strain on the trawl fleet, processors, and the support system in Kodiak.

The trawl fleet is heavily scrutinised and monitored. The PWS Pollock fishery is very well managed. There is a well established contact between the manager and the vessel operators. We are required to "check in" and the manager allows only 6-8 vessels in the area at a time. Upon finishing the trip we "check out." Sometimes the manager delays releasing a vessel to start fishing until the accounting is complete from the previous vessel, to make sure we do not exceed caps. Shutting down a well managed and a productive PWS fishery is the last thing we need. And it does not solve a thing, but only makes more problems. We also rely on our income from salmon tendering to get through the summer months when plants focus on salmon. Pollock are predators of young salmon and if left unharvested the pollock will eat all the young salmon hurting the PWS salmon fisheries.

This is why I STRONGLY oppose Proposals 14, 15, 16 & 17. Before making a decision, please consider these scientific factors that I have attached to my letter.

Sincerely  
Stoian Iankov  
F/V Michelle Renee

## POLLOCK PREDICATION OF JUVENILE PINK SALMON

### *Research papers*

#### **“Ecological processes influencing mortality of juvenile pink salmon (*Oncorhynchus gorbuscha*) in Prince William Sound, Alaska”**

Willette, T. M., Cooney, R. T., Patrick, V., Mason, D. M., Thomas, G. L., & Scheel, D. (2001). Ecological processes influencing mortality of juvenile pink salmon (*Oncorhynchus gorbuscha*) in Prince William Sound, Alaska. *Fisheries Oceanography*, 10, 14-41.

- Two facultative planktivorous fishes, Pacific herring, and walleye pollock, probably consumed the most juvenile pink salmon each year, although other gadids were also important
- Nine taxonomic groups of fishes and several seabird species consumed about 546 million juvenile salmon during the first 45 days of their life in PWS. These predation losses represented about 75% of the approximately 736 million juveniles that entered PWS from bordering streams each year and thus were within the range for survivals estimated during this life stage.
- The dominance of adult pollock in the system produces a state in which salmon may be more vulnerable to a population crash.
- The salmon enhancement industry in PWS has adopted the predator-swamping strategy. Our model simulations indicated that this strategy can fail if salmon densities decline to the satiation threshold when zooplankton densities are insufficient to shelter juveniles from predation. This is what occurred at WHN Hatchery in 1994 causing high mortality among high-density aggregations of salmon.
- Predation on fry by herring and pollock was apparently greatest from April through early June.
- Predation increased on years with low zooplankton biomass, triggering pollock and herring to find alternate food sources, such as salmon fry.

#### **“Walleye Pollock as Predator and Prey in the Prince William Sound Ecosystem”** Thorne, R. E. (2006).

Walleye pollock as predator and prey in the Prince William Sound ecosystem. *GADID STOCKS to FISHING AND CLIMATE CHANGE*, 289.

- Prince William Sound Science Center conducted winter-period surveys of adult pollock from 1995-2003. Pollock biomass in PWS ranged from 22,000-43,000 mt. The pink salmon predator monitoring studies assessed pelagic fish abundance and distribution synoptic with spring-period zooplankton surveys from 2000-2006. Both pollock and herring showed progressive migrations during the spring that were consistent with predation on inshore fishes including pink salmon fry.

#### **“Foraging behaviour of juvenile pink salmon (*Oncorhynchus gorbuscha*) and size-dependent predation risk”** Willette, T. M. (2001). Foraging behaviour of juvenile pink salmon (*Oncorhynchus gorbuscha*) and size-dependent predation risk. *Fisheries Oceanography*, 10, 110-131.

- All fish groups examined in the PWS fed to some extent on juvenile salmon. Trout and gadids consumed the greatest numbers of juvenile salmon per day on average.

#### **“Acoustic monitoring of juvenile pink salmon food supply and predators in Prince William Sound, Alaska”** Thorne, R. E., & Thomas, G. L. (2007, September). Acoustic monitoring of the juvenile pink salmon food supply and predators in Prince William Sound, Alaska. In *OCEANS 2007* (pp. 1-7).

IEEE.

- Several hatcheries annually release hundreds of millions of juvenile pink salmon into the water of PWS. Previous research has documented two critical factors in the juvenile salmon survival 1) the availability of large-bodied calanoid copepods, and 2) the abundance of walleye pollock.
- When *Neocalanus* abundance is low, pollock become piscivorous and are the dominant pelagic predator of pink salmon fry.
- Most pink salmon fry rearing in PWS are consumed by predators during their initial 60 days of early marine residence.

**Submitted by:** Pete Imhof

**Community of Residence:** Wasilla

**Comment:**

Proposals 51,52,53 I support, we all need to share the resources, sport and subsistence are continuing to get the burden of conservation with closures due to lack of king salmon stock, maybe it's time for thorough assessment and pre season forecast to determine when the commercial fisheries should be limited so we can all share the burden of conservation. with lack of fish in south central, Especially the mat valley where there's practically no fish for harvest...But more importantly we should all be on high alert with lack of king salmon stocks throughout Alaska, I really think forecasting and assessment of stocks to determine somewhat of an overall king salmon return would be very beneficial...

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**Submitted by:** Efim Ivanov

**Community of Residence:** Wasilla

**Comment:**

I support proposal 14

I support proposal 16

I support proposals 46,47 if ADFG can use those numbers for the up river escapement.

I oppose proposal 48

I oppose proposal 51,52,53 using only the sonar to regulate commercial fishing can lead to overescapement on the copper river, with out commercial fishing openers to regulate escapement. ADFG has been doing a decent job at regulating the escapement goal with at least 1 opener a week.

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November 26, 2024

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

Dear Members of the Board of Fisheries,

I am from Cordova, Alaska, and I am a retired commercial fisherman, having worked with both gillnet and seine. I fully support the hatcheries. Alaska's salmon hatcheries allowed me to catch more fish and make more money. Proposal 78 would result in fewer fish to harvest.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries

Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Bud Janson

A solid black rectangular box used to redact the signature of Bud Janson.

Cordova, Alaska



**Submitted by:** Tim Jean

**Community of Residence:** Houston

**Comment:**

I support that there be no changes to the regulations as they are stated I also support that the commercial guided fishing trips on the Copper River or allowed to continue as they are now if there needs to be regulation, it should be at the mouth of the river, where the commercial fisherman are taking advantage and keeping the locals from getting the fish that they deserve

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**BOF Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Meeting  
December 10 - 16, 2024**

Frank Jeffries

[REDACTED]

Anchorage, AK 99502

Thank you for your time. My input is as follows:

**Proposal 45 oppose**

Allowing subsistence fishing in closure areas while not allowing personal use is discriminatory to other users attempting to procure fish for use. The rationale given in the proposal is that it is ok for subsistence users because they are limited to 5 king salmon per household. Using that same rationale, personal use fishermen should be allowed the same access since they are limited to only one King salmon per year from the fishery.

**Proposal 48 support**

This allows access to the fishery for those who do not have the privilege of access to the shore or a boat of their own.

**Proposal 49 oppose**

This proposal unduly restricts those for outside the area from access to the fishery. If this is passed then subsistence users in all other harvest areas of the state should also be restricted to hunting/fishing only in the specific geographical area where they live. This would be patently unfair as is this proposal.

**Proposal 50 oppose**

Depth finders, chart plotters, etc. are generally all packed in the same unit. They are safety gear that allows boaters to more safely navigate the waters they are navigating. If a decision is made to restrict them in this fishery, doesn't it make sense also to prohibit them in all other fisheries? The escapement goals will not be helped by implementing this proposal and it is unnecessary and will increase the risk of accidents and damage to boats on the river.

**Proposal 55 oppose**

This ostensibly promotes "shared conservation" between upriver and down river commercial fishing. It does not. The author conflates commercial fishing with guide services and wants to shut down guides when the commercial fleet has restrictions while saying the rationale is based on coordination with others and historical data, though no data is presented. The facts are that the commercial fishery landed over 1.3 million reds and 8,200 kings last year compared to the

personal use fishery taking 160,000 reds and 200 kings. If kings are what we want to increase escapement of this proposal will have no significant impact on the success of the king run. It makes no sense.

#### **Proposal 58 support**

This will better allow the department to manage the escapement goals on both ends of the escapement range.

#### **Proposal 60 oppose**

This puts an undue restriction on personal use households. Personal use represents less than 10% of the commercial harvest and who knows how little of the subsistence catch. This proposal requests a 20% reduction of the personal use limit to address a 9% “over catch” issue that is most likely not recurring. This puts an undue hardship on personal use households as opposed to spreading the pain over all users.

#### **Proposal 61 oppose**

This will work a hardship on a vast number of personal use households for no appreciable gain for meeting escapement goals. This will essentially limit head of household limits until later in the season. Those who fish early in the season will need to make two trips to fill their freezer instead of one. In one of the earlier proposals, it was stated that it didn’t matter when subsistence users caught their fish because they were limited to 5 kings. If that argument works for subsistence it should work for personal use. It really doesn’t matter when the fish are caught, the limit is the limit and this proposal will have no discernable effect on overall escapement.

#### **Proposal 62 oppose**

This is unfairly punitive to the personal use fishery. In reality any impact of the personal use fishery is negligible compared to the subsistence and commercial catch. While I can appreciate the challenges faced by the commercial fishing interests, it makes no sense to hamstring personal use households when the harvest is less than 10% of the commercial fleet’s harvest. And who knows what a small percentage of the subsistence users’ harvest.

#### **Proposal 65 oppose**

Proposal 47 addresses this. It is not a good idea. Restricting permits to one week accomplishes nothing for the fishery. It makes it more work for personal use households to plan and complete their fishing trips. If something delays their trip they need a new permit. The earlier proposals regarding in season reporting can be accomplished without this proposal.

#### **Proposition 68 oppose**

This proposal will make personal use fishing more dangerous than it needs to be. Unlike the Kenai and Kasilof rivers the Copper River does not have long sandy beaches at the locations favorable for dip netting, many of them are along cliffs and rocky edges of the river. This proposal will effectively cut many personal use households off from an opportunity to harvest fish in the river. The adverse impacts of this proposal would overwhelmingly be experienced by seniors and those with physical impairments. This is manifestly unfair and discriminatory.

#### Proposition 69 oppose

Establishing more restrictions on dip netting from boats in an unnecessary change. Ultimately, escapement goals are what matters (It is ironic that the author of this proposal earlier proposed ways to make the commercial fleet more efficient in catching fish and another author of a proposal asking for permit stacking has the same name). This proposal calls for a restriction on dip netting practices with no apparent connection to, or impact on, sustainability of the fishery. It is unnecessary and should fail.

#### **Proposal 70 support**

This proposal will have no effect on escapement goals but it will increase the safety of the fishery. Opening this area to dip netting will relieve congestion on the river during times that many users are present and will reduce the chances for collisions, injuries, and potential loss of life due to accidents.

**Submitted by:** Pete Jenkins

**Community of Residence:** Anchorage, AK

**Comment:**

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

I am an Area E commercial fisherman. I've been a gillnetter, both drift and setnet, in Area E for the past 26 years. I've also longlined halibut and black cod in Prince William Sound and the North Gulf for over 20 years. I've either been engaged with or closely followed the Board of Fisheries process for most of this time; and find many of this cycle's proposals to be a direct threat to my livelihood and an unsubstantiated attack on the commercial fisheries (and hatcheries) in the Sound.

I respectfully ask you to consider my proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you.

Pete Jenkins, Emerald Bay Fisheries

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

My name is Pete Jenkins. I've been a gillnetter, both drift and setnet, in Area E for the past 26 years. I've also long-lined halibut and black cod in Prince William Sound and the North Gulf for over 20 years. I've either been engaged with or closely followed the Board of Fisheries process for most of this time; and find many of this cycle's proposals to be a direct threat to my livelihood and an unsubstantiated attack on the commercial fisheries (and hatcheries) in the Sound.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Pete Jenkins

A black rectangular redaction box covering the signature of Pete Jenkins.

Anchorage, AK

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

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**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:**

SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

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**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU



**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

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**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

November 26, 2024

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

Dear Members of the Board of Fisheries,

I have been commercial salmon fishing in Alaskan waters for 50 years. Sixty plus years as both sport and subsistence use of Alaska's rich salmon resources. I have seined, gillnetted, and set netted for salmon in Southeast Alaska, Bristol Bay and Area M. Since the hatchery program started fifty years ago it has added benefits to my commercial fisheries and sport fisheries, as well as my subsistence fishing. This proposal may not affect me directly now because I'm retired from salmon fishing commercially, but it is possible that it could impact my other users. It would substantially affect other members of my family who still make their living from commercial salmon fishing. It would also affect my community, the fish taxes generated from the salmon fisheries helps my community in many ways.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

John Jensen

A solid black rectangular box used to redact the signature of John Jensen.

Petersburg, Alaska

**Submitted by:** Leonard and Diane Jewkes

**Community of Residence:** North Pole Alaska (We have a boat in Valdez and fish in PWS)

**Comment:**

We fully support Prop #14 Due to the damage that the Trawler Fleet causes the ocean floor bed and all the bottom dwelling fish and marine life. This method also creates unacceptable amounts of By-Catch that do not survive

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My comments are in strong opposition to proposal 78. I am a third-generation commercial fisherman in PWS, subsistence & sport fisheries participant, a Native Village of Eyak tribal member, business owner and resident of Cordova.

I am not going to go into the obvious and detrimental financial impact to the PWS fisheries & families, PWS hatchery programs, and the local economies to all towns and tribal villages that generate revenue from the success of the hatchery program.

My comments are for the Board to pause and exercise extreme caution in placing significant weight to the loud voices on correlative research with little talk or context of the “third variable problem” that make causal relationships difficult to interpret. Correlational studies have potential for confounding variables and extraneous variables. Confounding variables are a third variable that influences or shows an apparent association between the study variables where no real association exists. Extraneous variables are variables that aren’t being studied that have the potential to affect the outcome of the study.

The analysis and opinions of many of the studies used to support proposal 78 are quick to dismiss or gloss over the potential of these variables to come to their conclusions.

What I am asking the Board for is to not make a rash decision that has so many quantifiable negative impacts by passing this proposal but let the current and continuing research play out and help define these variables.

Prince William Sound and its fisheries has an amazing blend of hatchery stocks and wild resources for all salmon species. We have many native tribes, tribal organizations and residents that have a history of subsistence, sport and commercial activity for generations. We all want sustainability not just for the PWS area but for residents of the whole state.

It is on record that the author of proposal 78 has a personal quarrel with PWSAC going back decades. There is history of this proposal or others like it submitted many times over many BOF cycles in the hopes that as Board members change, the outcome will change. I have hope and faith that objective science and informed conversation win the day over a grudge. I look forward to continued studies on salmon and studies on interactions of all species in the North Pacific ecology leading to the day we can get answers to our questions.

Eli Johnson

**Submitted by:** Christopher Johnson

**Community of Residence:** Wasilla

**Comment:**

I oppose proposal 89 because there is a growing amount of fishing pressure at Lake Louise and the burbot will decline once again if the limit is raised.

I support proposal 90 because there are local guides and recreational fisherman that take advantage of the 5 line rule and use it to catch lake trout purposely.

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**Submitted by:** Dale Kaercher

**Community of Residence:** Anchorage

**Comment:**

Dear Board of Fish members:

RE: PROPOSAL 16: 5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

I am writing in support of Proposal 16 to close the state-managed Prince William Sound (PWS) pollock trawl fishery. Trawling is an indiscriminate fishing method that leads to concerning levels of bycatch. Chinook salmon are struggling in large regions of the state resulting in Alaska Department of Fish and Game (ADFG) closing or heavily restricting fishing for sport and subsistence fishing throughout the state. The National Marine Fisheries Service now estimates bottom contact up to 60% of the time for trawl vessels like those used in PWS. The bycatch that is found in the trawl nets displays an unsustainable fishery that is dragging the seafloor. It is in the best interest of the State of Alaska to protect our resources and marine environment and close the state-managed PWS trawl fishery.

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November 24, 2024


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

Dear Board of Fisheries,

I am from Cordova, Alaska, and I am writing to express my strong opposition to Proposal 78. My husband and I owned and operated a commercial fishing business for over 30 years, fishing in Prince William Sound, the Copper River, and the Gulf of Alaska. I am currently retired but still hold permits and continue to participate in subsistence fishing. I have lived in Cordova for nearly 50 years and have been involved in the fisheries here since 1975. We raised our daughters fishing and participated in the PWS seine fishery.

I remember all too well the sad state of the PWS seine fisheries before the hatcheries were established. My daughter and her husband have recently invested in the PWS Seine fishery, and intend to raise their kids in fishing. A reduction in egg take levels would have financial negative effects on returns. I am concerned the rising cost of fuel, groceries, insurance and a depleted return would have a devastating effect on the fishing families of PWS and our local government. I see no concrete argument written in this proposal to warrant this 25% decrease.

Sincerely,  
Patricia Kallander

  
Cordova, Alaska



November 24, 2024

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

Dear Board of Fisheries,

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I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

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in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,  
Patricia Kallander

  
Cordova, Alaska

**Oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat.**

At the Chitina Personal Use fishery Alaskans harvest less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Well over 500,000 sockeye and tens of thousands of kings still are reported upriver every year. Sharing returning salmon among Alaskans is the law under state abundance-based management.

**Oppose Proposal #63 and #65 submitted by the Athna Intertribal Fish and Wildlife Committee.** Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery on the Copper River.

**Oppose Proposal #64 submitted by the Cordova District Fisherman United to restrict Alaskan households gather salmon under both an Upper Cook Inlet personal use salmon fishery permit and a Chitina personal use permit during the same year.**

Currently there is ample returning salmon to feed Alaskans in the town of Cordova while allowing families who choose to access publicly owned salmon for family use in the Copper River drainage.

**Lindsey Kangas**

**Submitted by:** Joseph Katz

**Community of Residence:** Cordova, AK

**Comment:**

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

I am an Area E commercial fisherman. I have been fishing for nearly 7 years now. I've been a permit holder in Area E for 4 years.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Joey Katz

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

My name is Joey Katz. I have been fishing for nearly 7 years now. I've been a permit holder in Area E for 4 years.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Joseph Katz

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Cordova

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

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**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

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**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

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**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

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**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

**Submitted by:** Matthew Keith

**Community of Residence:** Chugiak

**Comment:**

Bycatch is destroying our fisheries. It is particularly hard on PWS. As a boater and fisherman in the Sound for over twenty years I have seen the constant reduction in fish populations and restrictions placed on sport fishing while commercial fishing and trawling continues. Other countries find ways to eliminated bycatch, we should too. Furthermore, these types of restrictions should be applied to the Gulf and Bering Sea to protect our fisheries. We have all seen the decimation of king and chum salmon populations across the entire western and south central regions. We have also seen a constant trend of halibut population reductions. It is time to act and find ways to responsibly maintain commercial fisheries without wanton waste caused through bycatch.

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## COMMENTS ON 2024-2025 PRINCE WILLIAM SOUND/COPPER RIVER BOARD OF FISHERIES PROPOSALS

KRSA evaluated proposals based on their application/implications for sustainability, allocation, and orderly fisheries.

- Sustainability is considered in relation to needs and effects for meeting established escapement goals.
- Allocative proposals are considered on their merits rather than implied sustainability concerns. Proposals for reallocation of fishery harvest are often falsely represented as sustainability rather than allocative in nature
- Proposals for orderly fisheries concern effective implementation participant cost, safety, and enforcement.

KRSA also examines each proposal for what we call, “red flags.” These include:

- Proposals authored by individuals or groups seeking restrictions in fisheries other than the one they participate in while using conservation as opposed to allocation, as a justification.
- Proposals asking for more opportunity in the fishery they participate in, while at the same time proposing to restrict others, and again, using conservation as justification.
- Proposals where ADF&G is neutral on restrictions of one user, but in support of restrictions on another group.

Proposals are considered as written. Some proposals may include elements that have merit, but KRSA opposes these broader proposals which include other questionable elements.

Where actions are considered with respect to sustainability, subsistence fisheries clearly take priority and restrictions of commercial, sport and personal use fisheries should be implemented in proportion to existing use.

### Copper River Salmon (29 proposals)

Subsistence (7 proposals)			
44	Allow more than the legal limit of gillnet gear to be onboard a vessel used in the subsistence salmon fishery	Creates great difficulty in determining end use of fish.	Oppose
45	Allow subsistence fishing for salmon in the Copper River inside closure area	Inside closure is for conservation of king salmon.	Oppose
46	Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery	Not necessary for in-season management for established fishery objectives.	Oppose
47	Require in season reporting in subsistence and personal use fisheries	Not necessary for in-season management for established fishery objectives.	Oppose

48	Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict 45	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Support
49	Prohibit transport services in the Glennallen Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
50	Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts	Necessary for safe navigation.	Oppose
<b>Salmon Management Plans (5 proposals)</b>			
51	Reduce commercial salmon fishing opportunity in the Copper River District	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023.	Support in concept
52	Reduce commercial salmon fishing opportunity in the Copper River District	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023.	Support in concept
53	Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023.	Support in concept
54	Restrict use of Copper River District inside closure area during statistical weeks 20 and 21	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023. Adoption of this proposal would increase harvest potential for king salmon.	Oppose
55	Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted	Implementation of this proposal would have no effect on ability to manage for established in river goal objectives.	Oppose
<b>Personal Use (14 proposals)</b>			
58	Amend the Copper River King Salmon Management Plan	Staff Proposal	Support
59	Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan	Staff Proposal	Support
60	Modify the annual limit for the Chitina Subdistrict	Reduce Bag Limit	Oppose
61	Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict	Reduce Bag Limit	Oppose
62	Allow in season adjustment of the Copper River personal use maximum harvest level	Reduce Bag Limit	Oppose

63	Amend the opening date of the Chitina Subdistrict personal use fishery	Restrict PU fishery for “genetic diversity”	Oppose
64	Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year	Prohibit an Alaskan resident from participating in both Chitina and Cook Inlet personal use fisheries. Punitive and unnecessary, would have no effect on ability to manage for sustained yield.	Oppose
65	Require a weekly permit and in season reporting in the Chitina Subdistrict	Not required for management.	Oppose
66	Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal	The Chitina Subdistrict is not a terminal harvest area and management for Gulkana hatchery broodstock should have a negative effect on management for the wild stocks.	Oppose
67	Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict	Opposed out of concern for safety of participants.	Oppose
68	Prohibit dip netting from a boat in the Chitina Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
69	Establish restrictions when dip netting from a boat in the Chitina Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
70	Extend the lower boundary of the Chitina Subdistrict	This is long overdue.	Support
71	Prohibit guiding in the Chitina Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
<b>Sport (1 proposal)</b>			
72	Close sport fishing for salmon based on water temperature in the Gulkana River	This is a new one for Alaska. It's not very implementable.	Oppose



**PC313**

**Submitted by:** Munsey Kennon

**Community of Residence:** Homer , Alaska

**Comment:**

On the order of amendment of 73 and 74, being able to stack permits on a vessel would further decrease the amount of vessels fishing and allow fisherman to actually make a living.

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**PC314**

**Submitted by:** Cory Kent

**Community of Residence:** Anchorage

**Comment:**

Please manage Trawling at a rate that does not discriminate fish populations for the Alaskan population. All life is connected in some way in our shared ecosystem. Trawlers jobs are not more important than all others.

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**PC315**

**Submitted by:** Hunter Keogh

**Community of Residence:** Wasilla/Ninilchik

**Comment:**

I strongly support shutting down the PWS pollock trawl fishery. All of our fisheries in the state are hurting due to the trawl fleet and PWS is too small of an area to let draggers in to mop up what is left. It is directly effecting the substance life of Alaskans.

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**PC316**

**Submitted by:** Brian K. Kerley

**Community of Residence:** Tok

**Comment:**

I oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

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**Submitted by:** Aldean Kilbourn

**Community of Residence:** Paxson Lake and Fairbanks

**Comment:**

re: proposals that would affect Chitina Personal Use Dipnetting

As someone who values the fish my family and I have taken from the Copper river as part of our yearly diet, I want my voice heard on the following proposals.

I don't feel that the Cordova Drift Fishermen nor the Ahtna Regional Native Corporation should have any more access to the fish that go upstream to spawn than my family and me.

I oppose the following proposals before the Board:

44,45,46, 49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,& 71

All of these have a means to limit fish taken by my family and me.

I think that there is reason to support these proposals because they look to provide equality amongst all users and help keep Copper river fisheries healthy.

47, 48,51,52,53,58,59,70

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I am submitting personal comments as my own thoughts and concerns not to be affiliated with any board or organization I am on or part of.

I am a second generational born Cordovan, a NVE member, Eyak Corp shareholder, PWS sable fish permit holder, subsistence user, owner of a short-term lodging business (that support lodging to sport fishermen Aug-Sept), and most important a father. It is my opinion based off of the department's ability to consider a decision to support, appose, or obtain neutral that there is an inconstancy in the decisions being made at a management level. Multiple proposals have varied in the department's decision in this matter. These decisions should be based off of data that has been collected and be based off research that is being collected and/or has been collected. This inconsistency has led to a lack of trust for many user groups. That there is a vendetta, and the liability of this will result in negative repercussions for future preservation of these resources.

There should be accountability on all playing fields to ensure the resources are sustainable for future generations. Every user group of our resources should rely on unbiased direction, based off of correctly recorded data that is collected by these entities, not political agendas and propaganda. Without the ability to report timely, accurate data we will certainly decimate these resources we enjoy today, for future generations. This is a shared resource, and responsibility should also be shared. Proposals that would require timely reporting, establish more consistent bag limits amongst classified user groups, are two small steps to insure future stock for the next generation.

I'm stating this to call out the inconsistencies the department has as well as to address the issue the department has as data or the ability they have to collect accurate current data. Knowing that funding is an issue to collect this data is a main issue. It's disappointing that the

department is not supportive or neutral in these<sup>PC318</sup> proposals for test fisheries, that would supply the data at no cost to the state. Any proposal that has been brought forth with reasonable allocations, parameters, that the state has apposed with nothing more than response of "there isn't enough data to support this proposal or fishery" should be granted a reasonable second look.

My main ask of the board is "Please keep an open mind". There are many residents in our community that can and will be affected by the decisions that are made during these meets. A community that is made up of multiuser groups, subsistence, sport, commercial, and Alaska Natives, not the preconceived notion that only one user group utilizes the resources on the lower Copper River, which seems to be the most regulated area of the Copper River.

Lastly, my only drive is to do my part to ensure

my children have the same resources and opportunities that I have been privileged to. That they will also be gifted stability in a rural coastal community so they may chose to also reside here from generation to generations.

Kyle King

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen.

My husband and I have been fishing the area E drift gillnet fishery since 2019 after purchasing our boat in 2018. We have owned our drift permit since 2016.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Meghan King

[REDACTED]

WA state

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU



**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.**: OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU

**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Submitted by:** Tera Klein

**Community of Residence:** Fairbanks

**Comment:**

With the lack of fishery protection in the State of Alaska from trawlers and commercial fishing groups has been detrimental to my subsistence lifestyle. Now yearly struggling to fill our freezer with fish that we use for the entire year, and the fish I would fill those with are being pillaged by foreign entities from my native state is unacceptable.

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Kodiak, AK 99615

To: Marit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
[dfg.bof.comments@alaska.gov](mailto:dfg.bof.comments@alaska.gov)

November 26, 2024

RE: Proposal 78 – 5AAC 24.370 Prince William Sound Management and Management and Salmon Enhancement Allocation Plan

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

Kodiak Regional Aquaculture Association (KRAA) would like to thank the Board for this opportunity to comment on and voice our **opposition to Proposal 78** at the upcoming Prince William Sound meeting of the Board of Fisheries in Cordova.

Although Proposal 78 targets Prince William Sound (PWS) pink and chum salmon-producing hatcheries, it's implications, if passed, are far-reaching—potentially affecting all pink and chum hatcheries state-wide, as is the proponent's stated goal. Additionally, Proposal 78 is the same, or very nearly the same, proposal that has been before the Board in multiple instances for over 2 decades. At each turn and in each region, the Board has rejected the arbitrary, damaging, and unsupported 25% cut to hatchery production. Once again, there is neither more evidence nor a solid rationale supporting the contentions of Proposal 78. Furthermore, this proposal will cause certain harm to the people, the communities, the economy, and all the salmon users in Prince William Sound.

Proposal 78 was already heard and rejected by the Board as Proposal 55 at the most recent PWS Board of Fisheries meeting in 2021. In this current iteration, the proposer takes aim at the Prince William Sound Salmon Enhancement Allocation Plan as a means or vehicle to suggest the Board could reduce production for all PWS hatcheries. The PWS Salmon Enhancement Allocation Plan does not regulate hatchery production. It regulates the allocation of harvest of returning adult fish that are the product of Prince William Sound Aquaculture Corporation (PWSAC) hatcheries and is thus not an appropriate vehicle for the proposed action. While the proposal takes aim at all PWS pink and chum salmon-producing hatcheries. The target regulation and allocation plan is not inclusive of the Solomon Gulch Hatchery operated by Valdez Fisheries Development Association. For this reason, too, the cited regulation and the proposal itself are

not appropriate to the requested action. Generally speaking, it appears there are no regulations that directly refer to hatchery egg take permitted numbers that fall within Board authority. This is also a topic that has been discussed by the Board through the various iterations of this proposal. In all likelihood, the lack of the existence of hatchery permits in regulation is, at least in part, because the Department of Fish & Game has explicit authority to make those decisions.

In addition to the fact that Proposal 78 utilizes a regulation that is not a proper vehicle to address hatchery egg take permits, there's a good chance that attempting to use that regulation as a vehicle to change hatchery permitted egg take numbers would actually disrupt the ability of the allocation plan, for which the regulation exists, to meet the stated goals of the existing regulation. This issue was also cited in the ADF&G comments (RC2) for this meeting.

As with previous proposals of this type, it is necessary to point out that the proposed cut to pink and chum salmon production has no basis or foundation for the percentage of the proposed cut. It's a completely arbitrary percentage with no stated expected outcome other than a desire for less hatchery production. What analysis was conducted to determine this percentage will be sufficient to produce a desired result beyond "less"? What benefit will be conveyed? How is that to be quantified? What is the measure of success? These questions have not been answered, and in fact, it appears uncertain what actual problem the Board would be addressing by approving such a proposal.

What we do know about the outcome of this proposal, should it be passed by the Board, is the harm that will certainly be immediately conveyed to the people, fishers, communities and businesses in Prince William Sound. Record Copy 2 (RC2) for this meeting quantifies a dollar figure as an average of \$14.4M in annual pink and chum commercial ex-vessel value alone. When you factor in the multiplier effects of \$14.4 million dollars flowing through the communities and businesses in PWS and Southcentral Alaska as well as the loss in first wholesale value to processors, the lost jobs and the lost, related economic activity by support services, the 25% reduction in hatchery production will have an economically destabilizing effect in a number of Alaska communities. In contrast, cutting a significant portion of Prince William Sound's hatchery pink and chum salmon production, will have an almost insignificant effect on the overall biomass of pink and chum salmon in the North Pacific Ocean (see included attachment, RC70 from the 2024 Upper Cook Inlet Board of Fisheries meeting). To simplify: to take such drastic action against PWS hatchery programs without clear and conclusive scientific evidence supporting the need for such a reduction would be an act of deliberate act of harm to Alaska's fishermen and fishery-dependent communities with no clear benefit and no tangible nexus with any *potential* benefit.

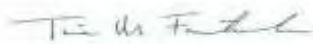
The enactment of this proposal will also damage the Prince William Sound Aquaculture Association's and Valdez Fishery Development Association's ability to maintain their

commercial programs, meet debt service and continue to provide benefit to the subsistence, sport and commercial fisheries of Prince William Sound and Southcentral Alaska. Pink and chum salmon provide not only direct benefit to commercial fisheries, they provide the main source of income for the Association. That income is then allocated to debt service, maintenance, and sustaining enhancement programs that are not “cost effective” such as programs for other species like coho, sockeye and Chinook. These additional enhancement programs provide benefit to ALL common property users—subsistence, sport, and commercial. Without the production and cost recovery opportunities for pink and chum salmon cuts would necessarily have to be made to the programs that did not generate revenue.

Alaska Hatchery operators have submitted a synthesis of numerous scientific papers, which has been updated for this meeting and will be on the record as a separate public comment, that provides a look at empirical science to counter the anti-hatchery rhetoric. This rhetoric is often portrayed in the news and through correlative science that begins with a premise that something wrong is to be found with Alaska Hatchery production. Repetition does not make something true. (see also KRAA comments on normative and advocacy-based science, PC128 for the 2024 Upper Cook Inlet Board of Fisheries meeting).

In summary, Proposal 78 is the same proposal the Board has rejected many times. The proposal improperly targets a regulation in Prince William Sound that isn’t associated with hatchery egg numbers and may render the regulation nonsensical and unworkable. The proposal has no clear or verifiable goal stated, no credible scientific basis, and no analysis of impact or whether there would be any benefit at all to local wild stocks, let alone those of other regions. Finally, the proposal would come at a huge cost to the people, fishers, and communities of Prince William Sound and Southcentral Alaska. We ask that you reject Proposal 78 because of its lack of merit and damaging consequences.

Thank you for the opportunity to submit these comments.



Tina Fairbanks  
Executive Director

February 25, 2024

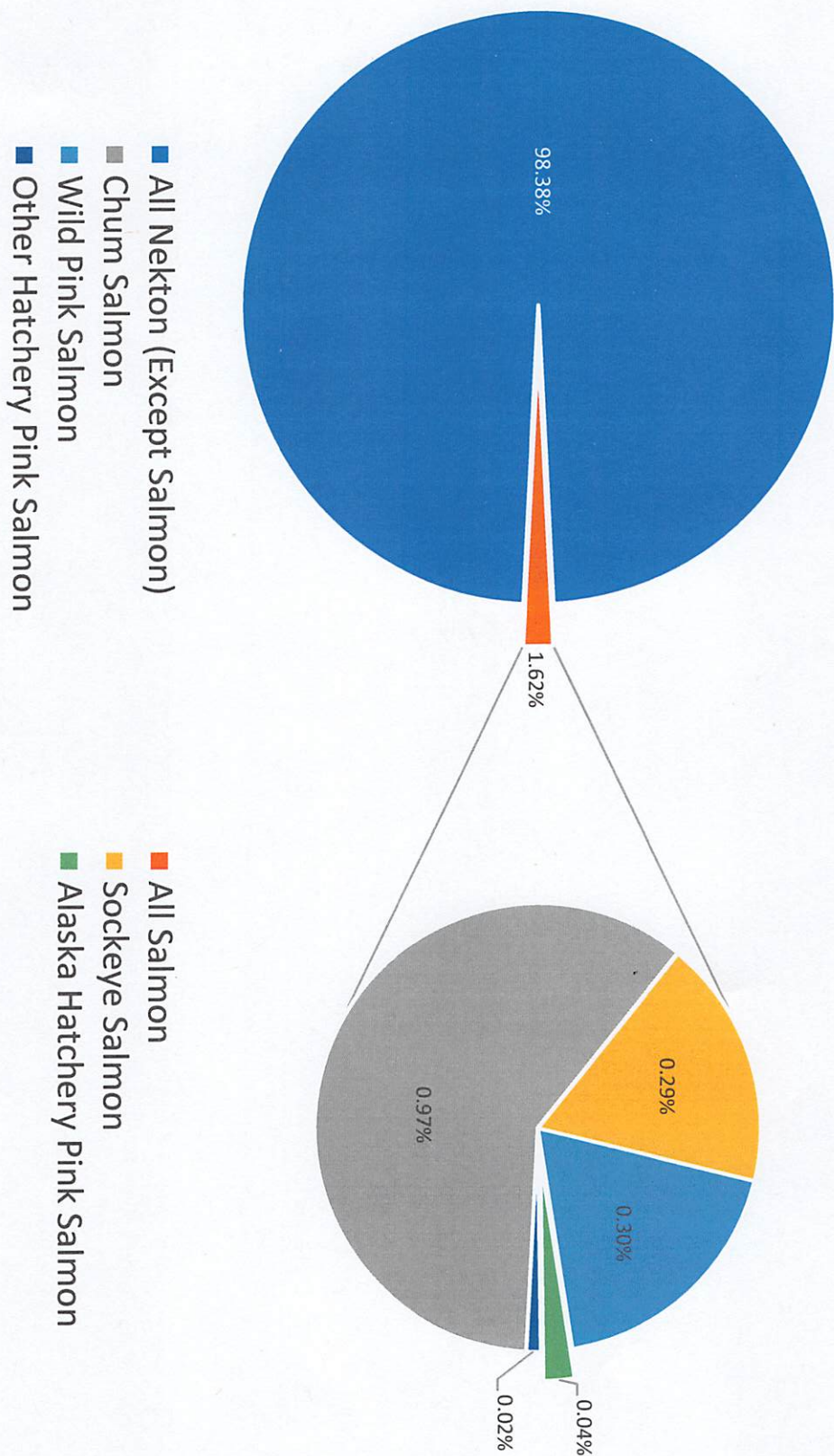
Alaska Board of Fisheries  
1255 W. 8th Street  
Juneau, AK 99811

Members of the Board of Fisheries,

Alaska's PNP Salmon Hatchery Operators respectfully submit this illustration showing the estimated percentage of Alaska's hatchery produced pink salmon within the total biomass of all Pacific salmonids and the biomass of all North Pacific Ocean nekton.

Thank you for the opportunity to contribute further relevant information to the discussion of the effects of hatchery pink salmon on the ecosystem.

## North Pacific Nekton Biomass



Source: Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate



Kodiak Seiners Association

Kodiak, AK 99615

November 26, 2024

To the Alaska Board of Fisheries,

The Kodiak Seiners Association (KSA) is writing in **opposition to proposal 78**, which seeks to reduce hatchery pink chum egg take levels by 25%. Although KSA strongly prefers not to engage on management decisions outside of the Kodiak region, we believe that this proposal sets a poor precedent for statewide salmon management and hatchery regulation and so we are compelled to weigh in on the subject.

The proposed large-scale cuts to hatchery output would result in certain and quantifiable negative economic outcomes for the PWS area and the state as a whole, while achieving unidentifiable and largely speculative gains. It is entirely unclear how reducing Gulf of Alaska (GOA) hatchery output would impact other salmon stocks when considering the proportion of total salmon biomass that is actually comprised of GOA salmon of hatchery origin. It is even more uncertain, and in truth unlikely, that adjustments to PWS egg take levels will have a measurable impact on Western Alaskan salmon stocks – KSA is currently unaware of any studies examining interactions between GOA stocks of hatchery origin and Western Alaskan chum and chinook stocks. In fact, these stocks likely interact far more with Asian and Russian stocks of hatchery origin, and the latter will likely continue to increase output to fill any market voids left by cuts to Alaskan production.

The hatchery programs in various regions around the state are all very different in scale and variety of production, enhancement goals, and overall success rates. Regulatory limits on enhancement programs need to be carefully considered and should result from thorough analysis specifically tailored to the program under consideration. This proposal is largely arbitrary and lacks any of the specificity that should be required before imposing this level of hardship on Alaskan fishing communities.

Darren Platt

KSA President



**Submitted by:** Arthur Konefal

**Community of Residence:** Fairbanks

**Comment:**

I recently read an email from the Chitina Dipnetters Association regarding the BOF proposals and I want to give my support to each of their recommendations. I found their reasoning to be both sound and fair and urge the BOF to support their choices.

Thank You.

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**Submitted by:** Arseny Konev

**Community of Residence:** Wasilla

**Comment:**

I support proposal 76

I oppose proposals 5,7,51,52,53

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**Submitted by:** Danikt Konev

**Community of Residence:** Cordova

**Comment:**

I am strongly opposed to proposals 48,51,52,53,59 because I feel like it will affect the fishery greatly and not for the better.

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Anchorage, AK 99503

November 25, 2024

Dear Members of the Alaska Board of Fisheries,

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has approximately 4,600 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Koniag has long advocated on issues affecting the viability and sustainability of the villages in our region. As part of this effort, Koniag supports sustainable salmon fisheries and strong hatchery production in Alaska.

Koniag writes today to express serious concerns and strong opposition to Proposal 78, which aims to reduce hatchery production of pink and chum salmon by 25% in Prince William Sound. As an organization dedicated to the prosperity and well-being of the communities we serve, we find that this proposal could severely disrupt not only a nearby region, but also set a troubling precedent for fisheries management across Alaska.

The proposed reduction in salmon hatchery output is alarming. Salmon hatcheries, including those managed by the Prince William Sound Aquaculture Corporation (PWSAC), are integral to the economic health of our region. They support numerous industries beyond just commercial fishing, including recreational tourism and local service sectors. A reduction of this magnitude threatens jobs and the economic lifeline of communities throughout Prince William Sound.

Hatcheries are vital for maintaining the stability of salmon populations that support diverse ecosystems. They provide a buffer that helps sustain salmon runs during variable environmental conditions, which are increasingly unpredictable due to climate change. A cut in hatchery production compromises this stability, potentially leading to greater fluctuations in salmon availability for all user groups.

Koniag's concern extends beyond the immediate effects of Proposal 78. Its adoption could initiate a series of regulatory actions aimed at further reducing hatchery outputs across the state. Such a precedent could progressively weaken the framework that has supported Alaska's fisheries for decades, leading to broader ecological and economic repercussions.

We urge the Board to consider the extensive implications of implementing such drastic changes without clear, science-backed justification. Maintaining robust hatchery operations is

crucial for the health of our fisheries and, by extension, our community's economy and cultural heritage.

Koniag stands with other stakeholders in urging the Board of Fisheries to reject Proposal 78. We advocate for a measured, science-driven approach to fisheries management that considers the long-term impacts on all communities, including those we represent.

Koniag appreciates the Board's consideration of our position on this vital issue. We hope that our input contributes to a decision that ensures the sustainability and resilience of Alaska's fisheries for future generations.

Thank you for your attention to this matter. Please contact Koniag Regional and Legislative Affairs Executive Tom Panamaroff ([tom@koniag.com](mailto:tom@koniag.com)) if you have any further questions.

Sincerely,



Shauna Hegna  
President



November 26, 2024

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

Dear Members of the Board of Fisheries,

I have participated in commercial, sport, personal use, and subsistence fishing activities in the four coastal communities I have lived in - Anchorage, Kenai, Kodiak and Cordova. Currently in Cordova, I participate in subsistence and sports fisheries.

As the local electric utility manager and former mayor of Cordova, the hatcheries are a key component to Cordova and generate significant energy sales, raw fish tax revenues, shipping and transportation economies of scale, employment, and secondary economic activity in Cordova and the region including Anchorage. Electricity rates would be higher in Cordova without hatchery stock seafood processing sales.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Clay Koplin

A solid black rectangular box used to redact the signature of Clay Koplin.

Cordova, Alaska

**Submitted by:** Ana Ku

**Community of Residence:** Homer

**Comment:**

I am a 26 year pws drift/longline fisherwomen and all that I oppose and support on this survey is in support of the fishery I've seen go down hill from all the allowable trawling and king dipnet fishing that's changed and been allowed in the last years.

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**Submitted by:** Karen Kurtz

**Community of Residence:** Anchorage

**Comment:**

Opposed to 89. Increasing the number of burbot from Lake Louise will decimate levels or reduce numbers too quickly.

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**Submitted by:** Daniel Kuzmin

**Community of Residence:** Salem, Or

**Comment:**

I oppose proposal 51, 52, and 53

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**Submitted by:** Dimitry Kuzmin

**Community of Residence:** Homer and Cordova AK

**Comment:**

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By

the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be fathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

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**PC331**

**Submitted by:** Dimitry v Kuzmin

**Community of Residence:** Homer

**Comment:**

I'm a 25 year Pws drift/ longline fisherman. I support and oppose everything in this survey to help remove trawlers from Pws because I have seen the longline fishery go downhill since they have been allowed into Pws. And I think the dip net fishery also needs restrictions with its mismanagement on the way it's run. I support permit stacking for more opportunity to use the permits that are sitting unused.

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**PC332**

**Submitted by:** Feodosia Kuzmin

**Community of Residence:** Wasilla

**Comment:**

I oppose 51,52,53

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**PC333**

**Submitted by:** Kondra Kuzmin

**Community of Residence:** Wasilla ak

**Comment:**

I oppose 51,52,53

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I am a Prince William Sound drift gillnetter. I oppose Proposal 48 and support Proposal 49.

Subsistence guiding and transportation should be illegal in the Copper River subsistence fishery to protect the integrity and purpose of the fishery. Subsistence rights are intended for personal use by eligible individuals and their households, ensuring access to traditional resources for food security and cultural practices. Allowing guiding or transportation services for profit could lead to overharvesting, strain on the fishery, and unfair advantages for those who can't afford such services, undermining the sustainability of the fishery and disadvantaging local communities who depend on it.

---

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

I fully support Proposal 13 to increase bycatch limits for skate in the Prince William Sound Pacific cod fishery. With reduced Pacific cod quotas and a healthy skate population, this change would provide valuable economic opportunities for small vessel fleets and boost local economies. It's a practical solution to better utilize an underused resource while reducing waste and supporting coastal communities.

---

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I am a Prince William Sound drift gillnetter. I am writing to express my support for Proposal 56 and 57.

A dual-permit operation would greatly benefit fishermen, especially in today's economic climate where the cost of living and operational expenses are climbing rapidly while fish prices remain stagnant. By allowing fishermen to hold two permits, they could increase their harvest capacity, leading to greater efficiency and



higher overall earnings. This added flexibility would help offset rising costs for fuel, gear, and maintenance, making it easier for fishermen to sustain their livelihoods and remain competitive in an industry facing constant financial pressures.

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**PC334**

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I support Proposal 50 because it helps ensure fairness by preventing those with expensive equipment from having an advantage.

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**PC334**

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I oppose Proposal 52. I see no point in implementing this change. If we follow this approach, we risk overescapement, and Fish and Game already knows how to manage the timing effectively. They already shut us down when needed in some years, so there's no need for additional restrictions. The current management system works well and doesn't require these changes.

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**PC334**

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I oppose Proposal 53. The past couple of years have shown that the early wild stocks were strong, so there's no need to close after the first two openings. Fish and Game already has a solid strategy in place, and the current approach is working well. Implementing an early closure would unnecessarily harm the commercial fleet.

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I oppose Proposal 51. Fish and Game already has an effective strategy in place for managing the Copper River commercial fishery, adjusting openings based on sonar data and stock assessments. The proposed restriction of limiting commercial fishing after two openings, based on a 70% sonar passage threshold, is unnecessary. It could disrupt the commercial fleet and harm the local economy without providing significant benefits for salmon conservation. The current management system is working, and there is no need for additional, burdensome limitations.

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer, Alaska

**Comment:**

My name is Larion Kuzmin, and I support Proposal 68. The increased use of boats to target holding areas in rivers disrupts fish that are seeking refuge during high water conditions. These areas, which were once inaccessible to fishermen from shore, now face significant pressure. Boats can disturb the fish's natural behavior, adding stress and potentially reducing their ability to continue upstream migration. This disruption, combined with the risks of catch-and-release mortality, can negatively impact already struggling king salmon stocks. Protecting these refuge areas is critical to ensuring the sustainability of the fish and maintaining healthy escapement levels.

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer, Alaska

**Comment:**

My name is Larion Kuzmin, and I support Proposal 69. More and more people are starting to use boats to fish the Chitina area, and I believe stronger restrictions are needed before this trend gets out of hand. Increased boat use can disrupt fish behavior, lead to overharvest, and put additional pressure on the resource. Implementing these restrictions now will help ensure the sustainability of the fishery for future generations.

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer, Alaska

**Comment:**

My name is Larion Kuzmin, and I am a Prince William Sound drift gillnetter. I am writing to express my support for Proposal 56 and 57.

A dual-permit operation would greatly benefit fishermen, especially in today's economic climate where the cost of living and operational expenses are climbing rapidly while fish prices remain stagnant. By allowing fishermen to hold two permits, they could increase their harvest capacity, leading to greater efficiency and higher overall earnings. This added flexibility would help offset rising costs for fuel, gear, and maintenance, making it easier for fishermen to sustain their livelihoods and remain competitive in an industry facing constant financial pressures.

---

**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin, and I support Proposals 14, 15, 16, and 17.

The Prince William Sound trawl fishery needs more restrictions due to its significant bycatch issues and sea floor destruction. Trawling gear often causes substantial damage to the sea floor, disrupting fragile habitats and negatively affecting marine ecosystems. The fact that bottom-dwelling species like rockfish are often caught in trawl nets further demonstrates the gear's impact on the ocean floor. Stricter regulations are necessary to protect marine life and the health of our ocean ecosystems, ensuring sustainable fishing practices for the future.

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is larion kuzmin and I oppose proposal 5 and 7.

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Good Evening esteemed members of the board,

As a 4th generation gill net commercial fisherman with a lifelong connection to the Copper River and Prince William Sound areas, I have dedicated myself to the preservation and sustainability of Alaska's fisheries. Three of my generations fished in the Copper River District the other in Cook Inlet. Becoming a captain at the young age of 17 with the encouragement and approval of the State of Alaska DCCED office. I have spent the last 8 years navigating the waters of the Sound, gaining valuable experience and insights along the way. I also build sport fishing, charter, and transportation vessels during the winter. Most of which end up in Prince William Sound and the Gulf of Alaska. I bring a unique perspective to the table.

I am writing to you today with a sense of deep concern regarding proposals 51, 52, and 53. As a member of the commercial fishing industry, I feel compelled to highlight the potential detrimental impact these proposals could have on the livelihoods of our hardworking fishermen.

The commercial fishing fleet is already facing significant challenges, with closures and difficult years becoming all too common. These proposals, if implemented, have the potential to deal a crippling blow to the entire fleet, pushing many fishermen into financial distress and uncertainty. As the state of Alaska actively encourages young individuals to enter the fishery and invest heavily in their futures, it is crucial that we support and nurture these new entrants rather than jeopardize their prospects.

Voting in favor of these proposals could result in a cascade of payment deferrals to the State of Alaska Division of Investments and financial difficulties for many within the industry. The repercussions would not only be felt by individual fishermen and the State of Alaska but also by entire communities and families that rely on the success of the commercial fishing sector for their well-being.

I implore you to consider the long-term ramifications of these proposals and the broader implications for the sustainability of the commercial fishing industry. It is in the best interests of all stakeholders to reject proposals 51, 52, and 53, and instead, work towards solutions that support the growth and prosperity of our fishermen and their communities.

Thank you for your time and consideration.

Other proposals I oppose:

48, 58, 59, 63

Maksim Kuzmin

**Submitted by:** Maxim Kuzmin

**Community of Residence:** Homer

**Comment:**

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

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**Submitted by:** Maxim Kuzmin

**Community of Residence:** Wasilla

**Comment:**

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

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**PC338**

**Submitted by:** Philip Kuzmin

**Community of Residence:** Wasilla

**Comment:**

I oppose 5,7,51,52,52

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**PC339**

**Submitted by:** Polagia Kuzmin

**Community of Residence:** Homer

**Comment:**

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data need to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

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**PC340**

**Submitted by:** Romil Kuzmin

**Community of Residence:** Wasilla

**Comment:**

I support them because times have changed draggers have been destroying the ocean there's a lot that needs to be done and I know it can be done in one day

As for when you're catching halibut sablefish should be open too that way there's less commute less fuel less emission better for the environment less gear loss

I do commercial fishing construction and sport fishing in Prince William sound has been in a very high decline on halibut sablefish and rock Fish due to draggers I have cruised behind 1 one time and you can almost walk on rock Fish A lot of them are shakers

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**PC341**

**Submitted by:** Zina Kuzmin

**Community of Residence:** Homer and Cordova

**Comment:**

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data need to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

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**PC342**

**Submitted by:** Kallistrat Kuzmin

**Community of Residence:** Delta junction

**Comment:**

I oppose proposals

5, 7, 51, 52, 53 and 25

I support proposals

76,15,17,22,43,49,56,57,68,69 and 4

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is larion kuzmin and I support proposal 76.

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**Submitted by:** Larion Kuzmin

**Community of Residence:** Homer alaska

**Comment:**

My name is Larion Kuzmin and I support proposal 79 and 81.

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**Submitted by:** Vladimir Kuzmin

**Community of Residence:** Delta jct

**Comment:**

I support proposals 76, 15, 12, 22, 43, 49, 56, 57, 68, 69, 4, 19, 20....

I oppose proposals 5, 7, 51, 52, 53, 25....

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**Submitted by:** Alexis Kwachka

**Community of Residence:** Kodiak

**Comment:**

Chairman and members of the Board of Fish,

I would like to speak in opposition to proposals 73 and 74 and any other permit stacking proposals that come before you.

Owner operated fisheries are the backbone of Alaskan coastal communities. Allowing 1 owner to operate 2 permits is a bad president for Alaska. We already are facing the greying of the fleet further exacerbating a negative will not alleviate this identified issue. Permit stacking can appear benign but it's not, it advantages established business plans over new entrants and further disadvantages new entrants from entering the fishery.

What are the criteria of success?

Who are the winners?

Who are the losers?

Lower 48 versus Alaska?

Who will even measure this?

I fish in several fisheries that this would be advantages to my 39 yr business plan but I say clearly NO.

Fishing is a struggle in the best of times do not put barriers in front of new business plans.

Ones failure is another opportunity.

Alexis Kwachka Kodiak.

**Submitted by:** Dan LaBrosse

**Community of Residence:** Fairbanks

**Comment:**

I'm a firm beleiver that our natural resouces belong to all Alaskan's equally. It is therefore in the best interest of all Alaskans that we support the use of these resources to benefit the most Alaskans by providing a solid subsistence resource to feed our families. However like most governed boards it appears that the most emphasis here is for the benefits of the much fewer commerical fishermen that look to make the greatest profits. This does not serve the majority of Alaskans very well at all! We need to prioritized susitence and use of our resources to benefiit the most Alaskans as possible, not the comercial interest of only a few.

**Submitted by:** Todd Ladd

**Community of Residence:** Cordova

**Comment:**

I oppose proposal 51,52,53. Cutting time will only do negative things for the community. Fish will continue to swim up river every day even during commercial fishing periods.

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**Submitted by:** Julie Lageson

**Community of Residence:** Fairbanks, AK

**Comment:**

I understand that our fishing industry is incredibly important to both our Alaskan residents and the world, however, please do not restrict our citizens as regards subsistence fishing. We have to prioritize feeding our own people.

I oppose proposals 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69 and 71. I support proposals 48, 51, 52, 53, 58, 59, and 70.

Thank you for your thoughtful consideration.

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**Submitted by:** Nathan Lake

**Community of Residence:** Hooper Bay

**Comment:**

I strongly oppose the trawlers fishing in Alaska waters! While we aren't able to fish and subsist for our natural foods due to low return salmon numbers, trawlers are able to slaughter and waste our valuable resource of food security. And we are treated like criminals just for trying to feed our families and elders of our communities by Alaska Fish and Game authorities. We are being oppressed

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

November 26, 2024

Re: **Oppose** Proposals 14, 15, 16, and 17 – PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Rob Langdon, and I am the captain of the F/V Evie Grace. I have been fishing in Alaska for the past 43 years, and I currently reside in Kodiak, Alaska. I am writing to formally oppose Proposal 14, 15, 16, and 17, which would lead to the closure of the Prince William Sound (PWS) pelagic trawl fishery.

I have fished in PWS for the past 7 years and have been tendering in the Sound for 11 years. Throughout this time, I have come to recognize the immense value of this fishery to the region, and I am deeply concerned about the negative impacts these proposals would have on the industry and coastal communities. The PWS pelagic trawl fishery is one of the first fisheries of the year, providing an essential economic lifeline for many Alaskan fishermen after the slower winter months. Its closure would cause significant hardship for the industry and those who depend on it, including my own operation.

This fishery is highly managed and closely monitored to ensure sustainability. It requires ongoing communication between the fleet and managers, mandatory check-in and check-out procedures before entering or leaving a management section, daily catch reporting, and limits on the number of vessels allowed to fish in the Sound at any given time. These regulations ensure the fishery's health and sustainability. As such, I believe that the PWS pelagic trawl fishery should remain open.

Furthermore, the Alaska Department of Fish and Game (ADF&G) staff, who have years of expertise in managing fisheries in the region, also oppose these proposals. The department has demonstrated its ability to effectively manage the fishery through mechanisms such as Emergency Orders to adjust bycatch limits and the deployment of observers when available. I trust that ADF&G can continue to manage this fishery responsibly.

The Alaska seafood industry is in a state of continued crisis, with many small vessel businesses, including mine, struggling due to historically low ex-vessel prices across multiple fisheries. I have been forced to cut costs and delay capital investments and maintenance to stay afloat. Losing the PWS pelagic trawl fishery would be devastating to my livelihood, as well as to the many others who rely on this resource.

I am committed to ensuring that future generations of Alaskan fishermen will be able to continue fishing in the Sound, supporting their families, stabilizing food security in Alaska, and contributing to the economic strength of our coastal communities. I strongly urge the Board of Fisheries to oppose Proposals 14, 15, 16, and 17 and to keep the PWS pelagic trawl fishery open.

Sincerely,



Rob Landon  
Captain, F/V Evie Grace

**Submitted by:** Peter Langworthy

**Community of Residence:** Fairbanks

**Comment:**

Responding to survey

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**Submitted by:** Christianne Lapierre

**Community of Residence:** Mat-Su Borough

**Comment:**

Prop 68, 69, 71 - oppose

Are you kidding about removing boats from personal use fishing? Not everyone can crawl down a cliff or back up. Not everyone has the means to get down an ATV trail. Not everyone has the physical ability to dip net from the shore. Can you imagine all of the fighting that is going to ensue when the shore fishing is overwhelmed and over crowded? Not everyone can afford a boat. What happens when all of the people who normally boat fish clash and compete with those who fish from the shore? People rely on these fish to feed their families. It is going to get ugly when people can't feed their families. Wait till someone gets pushed into the river . Did anyone put any long term thought into this?

Prop 60 and 61 - oppose

Again, people rely on these fish to feed their families. How do you think people are going to feed their families if you reduce the amount of fish they can catch. This is just going to lead to poaching when people go hungry.

Prop 58 and 59 - Support

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November 26, 2024

**RE: Letter of Support for Proposal 16 - Close the Prince William Sound pelagic trawl fishery – Submitted by The Chenega IRA Council**

I am writing to express my strong support for Proposal 16, which seeks to close the pelagic trawl fishery in Prince William Sound (PWS). This action is critical to ensuring the long-term sustainability of PWS fish species and habitats.

The current lack of oversight and transparency within the pelagic trawl fishery is deeply concerning. Unlike other fisheries, the trawl fishery operates without onboard observers or adequate monitoring by Alaska Department of Fish and Game (ADF&G) employees to accurately account for bycatch. This gap in oversight undermines public trust and limits our ability to make informed decisions about resource management. I urge the Board to pass Proposal 17, which would help address these critical shortcomings. However, Proposal 16 provides the most comprehensive and immediate solution by fully closing the fishery to protect PWS's unique ecosystem.

Prince William Sound is home to a diverse array of fish species that are vital not only to the region's ecological balance but also to the cultural, subsistence, and economic well-being of Alaskans. Closing the pelagic trawl fishery under Proposal 16 is the most protective measure we can take to safeguard these invaluable resources. Allowing this fishery to continue jeopardizes critical habitats and threatens species that depend on the Sound's fragile ecosystems.

The bycatch of rockfish, including shortraker and roughage rockfish, highlights the destructive nature of pelagic trawl nets. These species are not pelagic; they are demersal, spending most of their lives on the ocean floor. The presence of these long-lived fish in trawl bycatch demonstrates that trawl nets are frequently fishing the bottom, with devastating consequences for these slow-reproducing species. Some shortraker rockfish can live over 120 years, while rougheye rockfish can reach 250 years of age. Their removal from the ecosystem is not only unacceptable but also unsustainable.

The bycatch of Chinook salmon in the pelagic trawl fishery is equally concerning. Over the past decade, Chinook salmon populations have experienced significant declines, leading to severe restrictions or closures on sport, subsistence, and commercial fisheries statewide. It is unacceptable to allow any bycatch of this iconic species, especially when conservation and recovery efforts should be our top priority.

Proposal 16 represents a necessary step to protect Prince William Sound's fish and habitat from the damaging impacts of the pelagic trawl fishery. While Proposal 17 addresses some oversight issues, closing the fishery entirely is the most effective and protective measure. By passing Proposal 16, the Board will demonstrate its commitment to preserving the ecological integrity of Prince William Sound and safeguarding the future of Alaska's fisheries for generations to come.

Thank you for your time and consideration. **I urge you to pass Proposal 16 to protect the invaluable resources of Prince William Sound.**

Krystal Lapp

[REDACTED]  
Fairbanks, Alaska

November 26, 2024

**RE: Letter of Support for Proposal 15 - Modify bycatch limits in the Prince William Sound pelagic trawl fishery – Submitted by The Chenega IRA Council**

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit testimony regarding Proposal 15, which seeks to modify bycatch limits in the Prince William Sound (PWS) pelagic trawl fishery. I strongly support this proposal as it provides critical improvements to current management practices that will help protect PWS fish species and their habitats.

Under the existing regulations, bycatch limits are set at no more than five percent of the total round weight of the walleye pollock harvest. While this percentage-based cap seems reasonable on the surface, it can unintentionally allow bycatch to increase as the Guideline Harvest Level (GHL) for pollock increases. This creates a scenario where higher pollock harvests lead to greater amounts of bycatch, putting vulnerable fish species and the broader ecosystem at unnecessary risk.

By implementing a fixed bycatch cap in pounds, as proposed, this regulation would provide a more consistent and precautionary approach to bycatch management. It ensures that bycatch amounts remain independent of increases in the total pollock harvest, helping to reduce overall bycatch levels and better protect PWS resources.

**Protecting Vulnerable Species:** Bycatch in the pelagic trawl fishery often includes Chinook salmon and long-lived rockfish species like shortraker and rougheye, which are under significant conservation pressure. Establishing a fixed bycatch cap will help protect these vulnerable species from overexploitation.

**Supporting Sustainability:** A fixed bycatch cap ensures bycatch levels remain low regardless of increased harvests, aligning with Alaska's commitment to sustainable fisheries and reducing waste.

**Enhancing Transparency and Accountability:** Proposal 15 also calls for bycatch to be brought back to port and surrendered to ADF&G. This requirement would improve transparency and accountability in the fishery, allowing for better data collection, enforcement, and oversight. It ensures that bycatch is not discarded at sea, which can obscure the true impacts of the fishery on non-target species.

Proposal 15 represents a pragmatic and forward-thinking approach to managing bycatch in the PWS pelagic trawl fishery. By setting a fixed bycatch cap and requiring all bycatch to be surrendered to ADF&G, this proposal prioritizes the health of PWS ecosystems, supports sustainable fishery practices, and upholds Alaska's reputation as a global leader in responsible fisheries management.

I urge the Board of Fisheries to adopt Proposal 15 to ensure the long-term health and sustainability of PWS resources for the benefit of all Alaskans.

Thank you for your time and consideration.

Krystal Lapp

[REDACTED]  
Fairbanks, Alaska

November 26, 2024

**RE: Letter of Support for Proposal 17 - Establish observer requirements in the Prince William Sound pelagic trawl fishery– Submitted by The Chenega IRA Council**

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to provide testimony in support of the proposal to establish observer requirements in the Prince William Sound (PWS) pelagic trawl fishery. This proposal is a necessary step toward ensuring the sustainable management of the fishery and maintaining public trust in the integrity of its operations.

The PWS walleye pollock trawl fishery is the only trawl fishery in Alaska with 0% observer coverage, relying solely on self-reporting by the user group. This lack of independent oversight raises significant concerns about the accuracy of bycatch reporting and the potential for overfishing. Without verification, it is impossible to ensure compliance with regulations or to assess the true impact of the fishery on non-target species and the broader ecosystem.

Requiring 100% electronic observation and 50% physical onboard observer coverage, as outlined in this proposal, would provide the verification and accountability necessary to uphold the standards of sustainable fisheries management.

**Accurate Bycatch Monitoring:** Independent observation will ensure accurate reporting of bycatch, including vulnerable species such as Chinook salmon and rockfish. This data is essential for making informed management decisions and for protecting species already under significant conservation pressure.

**Prevention of Overfishing:** Observer requirements will deter illegal, unreported, and unregulated fishing practices, helping to prevent overfishing and ensure the long-term sustainability of PWS fisheries.

**Increased Transparency and Public Trust:** Independent oversight through electronic and physical observation enhances transparency and accountability in the fishery, fostering public confidence in its management. This is particularly important in a fishery that has operated without any observer coverage to date.

Establishing observer requirements in the Prince William Sound pelagic trawl fishery is a vital step toward ensuring the integrity, sustainability, and transparency of this fishery. I strongly urge the Board to adopt this proposal to safeguard PWS fish populations and habitats for future generations.

Thank you for your time and consideration.

Krystal Lapp

[REDACTED]  
Fairbanks, Alaska

**Submitted by:** Denny Lars

**Community of Residence:** Hillsboro

**Comment:**

I absolutely support the closure of the wasteful and unsustainable trawl fishery in Prince William Sound, Proposals 14, 15 & 16.

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**Submitted by:** Margie Larson

**Community of Residence:** Russian Mission

**Comment:**

Stop the Trawlers! Stop the fisherman and the companies for taking or wasting our fish!

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**Submitted by:** Kirk Lavender

**Community of Residence:** Oregon

**Comment:**

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the destructive and unsustainable commercial PWS pollock trawl fishery as specified in Proposals 14 and 16. If the Board fails to pass either of these Proposals, I would highly encourage them to consider measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.

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Nov 25, 2024

Dear Members of the Alaska Board of Fisheries,

I am writing on behalf of Lazy Otter Charters, We are a water transportation business operating in Whittier, Alaska. We operate water taxi in and around the Sound as well as offer sightseeing to the visitor industry. We have worked with Prince William Sound Aquaculture Corporation (PWSAC) for many years and believe they play a very important role in healthy fisheries in our area. Because of our role in the transport and visitor industry our business is intertwined with the health and sustainability of the fisheries in Prince William Sound, and we are concerned about the impacts of Proposal 78 on the region's hatchery operations, specifically those managed by PWSAC.

**Critical Role of Hatcheries:** PWSAC plays a pivotal role in supporting sustainable harvests that benefit all user groups across the Sound, including commercial, recreational, and subsistence fishermen. The proposed 25% reduction in pink and chum salmon production poses a significant threat to these groups by undermining the stability and sustainability of the salmon stocks that are crucial for the regional economy.

**Economic Impact:** The stability of our local economy, particularly in communities like Whittier, is heavily reliant on the success of hatchery operations. Proposal 78 threatens this stability, potentially leading to economic downturns that could affect numerous sectors, including tourism, which relies on a healthy marine ecosystems to attract visitors.

**Support for Sustainable Practices:** As a company that works closely with PWSAC, we understand the importance of maintaining robust salmon populations not only for economic reasons but also for ecological balance. Reducing hatchery production risks depleting stock levels, which could lead to stricter fishing regulations and diminished tourist attraction, impacting our business in our community.

**Call to Action:** We urge the Board to consider the broader impacts of Proposal 78 and reject this measure. Maintaining the current levels of hatchery production is essential for preserving the health of Prince William Sound's marine ecosystems and the economic vitality of the communities that depend on them.

Eagle River, AK 99577 \* Whittier, AK 99693

Lazy Otter Charters is committed to supporting sustainable fisheries management practices that ensure long-term viability and prosperity for all stakeholders in Prince William Sound. We appreciate your attention to our concerns and hope for a favorable resolution that continues to support the vital role of hatcheries in our region.

Thank you for considering our perspective on this critical issue.

Mike and Kelly Bender  
Owners  
Lazy Otter Charters Inc

[REDACTED], Eagle River, AK 99577 \* [REDACTED], AK 99693  
[REDACTED]  
[REDACTED]

**Submitted by:** Jason Lee

**Community of Residence:** Cordova

**Comment:**

I am opposed to proposals 51,52 and 53. Our area biologist has all the tools to manage this 'mixed stock' fishery and does so well. He has a good track record despite many challenging and diverse circumstances of runs and run timings and his experience at this position is invaluable. These proposals would limit his ability to manage the stocks in accordance with maximum yield principles. For instance in years of high abundance of sockeye, these proposals would violate those principles and over escapement would cause undesirable boom and bust salmon stock returns.

Sincerely,

Jason Lee

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**Submitted by:** Jason Lee

**Community of Residence:** Cordova

**Comment:**

The commercial fleet is an invaluable resource management tool that takes the 'excess' numbers of fish. Quite reliably the inRiver goal is met and exceeded, which provides consistent escapement numbers. If the fleet is not allowed to fish 'as needed' on the early run, drastic overescapement will occur. And the run will suffer. Also our incomes and communities and way of life will suffer. The key to remember in regards to these proposals is that physical river and ocean conditions, climate, and run timing and strengths vary so much year to year that a proposal such as these would be so harmful and detrimental to our communities and the stocks. Jeremy has all the tools he needs to manage these stocks in season with large variance from year to year. In years of large abundance, hundreds of thousands of sockeye go up the river in a matter of days. In years such as these, having a regular schedule of two 12 hour periods a week is absolutely imperative.

Sincerely, Jason Lee

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**Submitted by:** Ellen Leisner

**Community of Residence:** Palmer

**Comment:**

My family has been participating in the personal use fishery for over 20 years. 44 there is no reason that more than the legal amount of gill net gear be allowed. 45 The subsistence fishery should not be opened in the closed area, this would infringe upon the personal use fishery. I don't have the time to comment on each of these proposals. I am pro personal use fishing. Many of these proposals are pro commercial fishery. Many Alaskans depend on personal use fishing.

OPPOSE Proposals 44,45,49,50,55,

56,57,60,61,63,64, 67,68,69,71

Support proposals: 48,51,52,53,58,59,70

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I am opposed to following proposals:

44-47; 49-57; 60-69; and 71

My wife and I have lived in Alaska for the past 43 years. For the majority of that time, while working, we lived in various locations in Southeast Alaska, Kodiak Island area and also Cordova. Without exception in these places we were able to fulfill our subsistence needs for salmon by sport fishing in streams or with a small boat in saltwater. Since retiring and moving to Anchorage to be near our children and grandchildren we have found it extremely difficult and frustrating to harvest enough salmon for our needs.

The last 2 years we have participated in the Chitina dipnet fishery with a charter boat service, and we are very happy and appreciative of the opportunity that this subsistence fishery provides. In just seeing the families that are utilizing this resource both from boats and shore, you understand how important it is to Alaskans. I am too old to be dangling from cliffs with a dipnet, so the charter service allows me to participate. I believe that fish and wildlife in Alaska should be for general public first with the excess being allocated to the commercial ventures.

We appreciate the effort the ADFG does in maintaining the salmon runs and hope to be able to get our subsistence fish in the Chitina area for years to come.

Norman Lepschat

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am a 4th generation Area E commercial fishermen.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Eric Lian

A solid black rectangular box used to redact the signature of Eric Lian.

Cordova

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:**  
SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:**  
OPPOSE this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:**  
SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:**  
SUPPORT this proposal with CDFU

November 24, 2024


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

Dear Board of Fisheries,

I am from Girdwood, Alaska, and sport and personal use fisheries are how I interact with the salmon fishery. Alaska's salmon hatcheries have benefited my family by putting food on our table, and when we have an abundance, we share with others in our community. If pink and chum salmon are reduced, more pressure would be put on other species. Please review the following reason why the Board should oppose and reject Proposal 78:

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sincerely,  
Kris Lillemo



Seward, Alaska



November 24, 2024


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

Dear Board of Fisheries,

I am from Seward, Alaska, and sport and personal use fisheries are how I interact with the salmon fishery. I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. Alaska's salmon hatcheries have benefited my family by putting food on our table, and when we have an abundance, we share with others in our community. If pink and chum salmon are reduced, more pressure would be put on other species. Please review the following reason why the Board should oppose and reject Proposal 78:

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sincerely,  
Kris Lillemo

  
Seward, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I am from Anacortes, Washington, and I am tied to seining. Without the hatchery program in PWS, the seine fleet would be non-existent. Hatcheries are the mainstay of well over 200 seine boats. Proposal 78 would directly impact every fisher. I can't imagine taking a 25% cut in my gross income. It's tough enough right now to find a crew, and with this proposal, it would be nearly impossible.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both

major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,  
Joe Lindholm

[REDACTED]

Anacortes, Washington

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen.

I have participated in the salmon drift gillnet fishery in Area E since 1978. I have participated in the halibut longline fishery in Area 3A since 1997. I have also served on many fishery-related boards over the years, including PWSAC, Copper River/PWS Marketing Association, and the Copper River Fishermen's Cooperative.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

William Lindow

A solid black rectangular box used to redact the signature of William Lindow.

Cordova

**Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.:** OPPOSE this proposal with CDFU

**Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 3 - Modify Prince William Sound groundfish pot specifications.:** SUPPORT this proposal with CDFU

**Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.:** OPPOSE this proposal with CDFU

**Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.:** SUPPORT this proposal with CDFU

**Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.:** SUPPORT this proposal with CDFU

**Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.:** SUPPORT this proposal with CDFU

**Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 23 - Prohibit the retention of sablefish from state waters.:** SUPPORT this proposal with CDFU

**Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 27 - Modify rockfish bag and possession limits.:** SUPPORT this proposal with CDFU

**Proposal 28 - Modify the rockfish area, bag and possession limit.:** OPPOSE this proposal with CDFU

**Proposal 29 - Create additional provisions for yelloweye rockfish management.:** SUPPORT this proposal with CDFU

**Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.:** SUPPORT this proposal with CDFU

**Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.:** OPPOSE this proposal with CDFU

**Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.:** SUPPORT this proposal with CDFU

**Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.:** SUPPORT this proposal with CDFU

**Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.:** SUPPORT this proposal with CDFU

**Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.:** OPPOSE this proposal with CDFU

**Proposal 43 - Establish a directed octopus fishery in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.:** SUPPORT this proposal with CDFU

**Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:** SUPPORT this proposal with CDFU

**Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.:** OPPOSE this proposal with CDFU

**Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.:** OPPOSE this proposal with CDFU

**Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.:** SUPPORT this proposal with CDFU

**Proposal 58 - Amend the Copper River King Salmon Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.:** OPPOSE this proposal with CDFU

**Proposal 60 - Modify the annual limit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.:** SUPPORT this proposal with CDFU

**Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:** OPPOSE this proposal with CDFU

**Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.:** SUPPORT this proposal with CDFU

**Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.:** SUPPORT this proposal with CDFU

**Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.:** OPPOSE this proposal with CDFU

**Proposal 71 - Prohibit guiding in the Chitina Subdistrict.:** SUPPORT this proposal with CDFU

**Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.:** SUPPORT this proposal with CDFU

**Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.:** OPPOSE this proposal with CDFU

**Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:** SUPPORT this proposal with CDFU

**Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.:** SUPPORT this proposal with CDFU

**Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:** SUPPORT this proposal with CDFU

**Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.:** OPPOSE this proposal with CDFU

**Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.:** SUPPORT this proposal with CDFU

**Proposal 85 - Modify the bag and possession limit for coho salmon.:** OPPOSE this proposal with CDFU

**Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.:** SUPPORT this proposal with CDFU

**Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.:** SUPPORT this proposal with CDFU

**Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.:** SUPPORT this proposal with CDFU

**Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.:** SUPPORT this proposal with CDFU

**Proposal 97 - Reduce the minimum herring spawning biomass threshold.:** SUPPORT this proposal with CDFU



**Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.:** SUPPORT this proposal with CDFU

**Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:** SUPPORT this proposal with CDFU

**Proposal 100 - Adopt a Kayak Island District herring management plan.:** SUPPORT this proposal with CDFU

**Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.:** SUPPORT this proposal with CDFU

**Submitted by:** Robert Linville , Dutch Lady Fisheries LLC

**Community of Residence:** Seward

**Comment:**

Proposal #78 Comments:

Dear Alaska Board of Fish

I urge each of you to reject this proposal flat out. Our industry has been through a couple hard years but survives ready for the 2025 season. This proposal threatens our ability to survive. Please consider the following points as you deliberate Proposal #78:

- 1.) Cutting off Alaska's hatchery program will not even diminish the ultimate number of hatchery grown pink salmon fry released into the North Pacific ocean each year. Russia continues to expand its hatchery program with no end in sight. Ask the proposer to initiate an international agreement to serve the purpose he seeks.
- 2.) The hypothetical justification will not in real life bring back even one additional king salmon. However, it will seriously damage the commercial fishing industry from Ketchikan to Kodiak.
- 3.) That damage extends to the sport fishery as it also consists of hatchery returns.

Thanks for your consideration.

Bob Linville

Seward, AK

**Submitted by:** Robert Linville IV

**Community of Residence:** Cordova

**Comment:**

56

opposed. This proposal is meant to further opportunity for already established permit holders and incentivize the purchase of permits to effectively “buy that boat off the point”

When this was most recently done in the pws seine fleet the crew benefit mentioned was an added 100k to the permit price inside the week of the board meetings. As you might imagine this did not help crew or any young fisherman trying to buy in. I would like to see the same access I enjoyed to this fishery extended to the next generation.

73

Opposed

Permit stacking or incentivizing the fleet to buyback permits will just further put crew and new entrants at a disadvantage. The last “stacking” proposal was flaunted as “good for crew” when in reality permit prices jumped 100k immediately and largely existing permit holders bought permits and put them in crews names season by season with no added share. This is just a continuation of the greed displayed in the first proposal.

**PC367**

**Submitted by:** Keith Lipse

**Community of Residence:** Big Lake

**Comment:**

Sorry for not reading the proposals just found about the SOA changing the way I have been getting food for my family. Leave things alone shut down the boats in salt water before residents. personal use fish should have preference over out of staters.

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**PC368**

**Submitted by:** David Lisov

**Community of Residence:** Copper river drift gillnet fisherman

**Comment:**

I oppose proposals 51, 52, and 53.

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**PC368**

**Submitted by:** David Lisov

**Community of Residence:** Copper river drift gilnet

**Comment:**

I oppose proposal 5, 7, and support 76

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**PC369**

**Submitted by:** Teal Lohse

**Community of Residence:** Cordova

**Comment:**

I am commenting on proposal 7.

I oppose this proposal.

Since 2012 the guideline harvest level (ghl) for lingcod in the inside district has been set at 7,300 pounds. Since then the average yearly harvest has been 3694 pounds. With only two yrs exceeding or approaching the ghl. ( In 2019 the harvest was 7,388 and in 2018 harvest was 6,688lbs). The two yrs prior to that were 2017 with 460 lbs

and 2016 at 404 lbs. The two yrs after that were 2020 at 3052 lbs and 2021 at 2,341 lbs. My point is the fishery has been open from the season start of july 1st till the end at dec 31st Almost every yr and so there has been opportunity for a person who wanted to target lingcod using jig gear without closing down the fishermen catching them with longline gear. In the future if the ghl starts getting consistently caught and opportunity starts to get limited this proposal could be revisited, as of now it appears a non issue and i believe regulations should remain as they currently are.

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**PC370**

**Submitted by:** Trae Lohse

**Community of Residence:** Cordova

**Comment:**

Opposed to Proposal 73/74 I would draw attention to the fact that during the 2021 BOF a big argument heard time and again for being able to fish two permits on a seiner was that it would help new entrants to the fishery get a start as a permit holding crew member. These proposals would have the opposite result of that supposed intent.

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**Submitted by:** Tyee Lohse

**Community of Residence:** Cordova

**Comment:**

I oppose proposal 44, I don't believe more gear is necessary and could result in catching too many fish. I oppose proposal 45, in the area that skiff fish the inside is open already. I support 46 and 47, I believe in season reporting could be an important management tool. I oppose 48, this was put in place for a reason, guiding has no place in subsistence and sets a precedent. I oppose 51, this does not align with Adfandg management which has been working. I oppose 52. I oppose 53. I oppose 56, I don't support permit stacking it eliminates opportunity and makes less people more money. I oppose 57, I want more opportunity for young fisherman. I support 60, I think this is a more reasonable limit. I support 67, I think removing king salmon from the water increases mortality, I oppose 70, the lower boundary was already extended last cycle we can't extend this every new cycle. I support 71. I oppose 83, one rod is sufficient for 1 angler. I support 84, if guiding for fish you should not be fishing

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November 26, 2024

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

Dear Members of the Board of Fisheries,

I am a born and raised Cordovan, I sport fish, subsistence fish, and commercial fish. My Family lives on fish in the winter, we make a living fishing. Salmon hatcheries in Alaska provide a huge economic boost to the state, they provide increased sport and subsistence opportunities for all user groups. They alleviate fishing pressure on wild stocks. It is very important to maintain current hatchery production levels. I catch hatchery fish to sell. They are a big portion of my livelihood, and also to feed my family. This would affect my business economically, It would also affect the crew that works for me.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a

strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Tyee Lohse

A solid black rectangular box used to redact the signature of Tyee Lohse.

Cordova, Alaska

**Submitted by:** Sandra Loomis

**Community of Residence:** Talkeetna

**Comment:**

I Oppose Alaska Board of Fisheries proposals #59, #60, #61 & #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

At the Chitina Personal Use fishery Alaskans harvest less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Sharing returning salmon among Alaskans is the law under state abundance-based management.

I Oppose Proposal #65 submitted by the Athna Intertribal Fish and Wildlife Committee. Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery on the Copper River.

I support#'s: 50, 55, 62, 69 and 63.

Thank you,

Sandra Loomis



Talkeetna. AK. 99676

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November 26, 2024

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

Dear Members of the Board of Fisheries,

I'm a 3rd generation commercial fisherman. I am a seine boat captain and tender owner. My family helped to create the hatcheries in the Prince William Sound and would be economically devastated if they were to go away.

Proposal 78 is a financial cleaver to an already desperate industry. I know several fisherman who are living on loans and temporary funds, just hoping to make it to summer 2025. If the egg take goes down 25% it will fundamentally change the ability to make a living wage in the fishery. If the egg take goes down 25%, unfortunately the operating expenses don't go down 25% in turn, so at a minimum there would be a relative increase in the total amount of cost recovery needed to support the hatcheries.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Alexander Lopez

[REDACTED]

Valdez, Alaska

November 26, 2024

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

Dear Members of the Board of Fisheries,

I am a commercial and sport fisherman. Three generations of my family have benefited tremendously from the hatchery system in Prince William Sound. My family would be decimated by this. WE've always prided ourselves in the amazing sustainability model of the hatchery systems, and all of our livelihoods rely on it.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable

by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Thomas Lopez

[REDACTED]

Valdez, Alaska

**Submitted by:** Jeffrey Loughrey

**Community of Residence:** Anchorage

**Comment:**

By Jeffrey L. Loughrey

Oppose: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72

Support: 48, 58, 59, 70

I have read the proposals, and this makes me sick. I came to Alaska 40 years ago for the hunting and fishing. It has become extremely difficult for me to recreate and feed my family with the opportunities remaining. Now at 64 my legs are not strong enough to safely fish the cliffs of the copper, and using my 21' jetboat myself just scares me. We used a charter service this last year which enabled me to continue participating in this fishery. Now these proposals are nothing more than the commercial guys wanting even more of a disproportionate share. Alaska should be for Alaskans benefiting as many as possible with the limited resources. The split between commercial and personal use needs to be balanced. The Copper commercial guys take 88% of the sockeyes and 98% of the Chinook. And now they want more? Thats just wrong. And selfish.

Jeff

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**Submitted by:** Doug Luiten

**Community of Residence:** Anchorage

**Comment:**

I strongly urge you to adopt proposal 51 to ensure healthy sustainable returns of salmon to the Copper River. Our family has utilized fish from this area since the '60's and it is too valuable a resource to perish. Please do not let this fishery go by the wayside , much like the runs in the Columbia.

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**Submitted by:** Taleen Lundale

**Community of Residence:** Big Lake

**Comment:**

I am in support of proposals 14, 15, 16 and 17 seeking action to update regulations of the Pollock trawl fishery in Prince William Sound.

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**Submitted by:** Stephen Luther

**Community of Residence:** Mat-Su

**Comment:**

I am writing to Oppose Proposal #63 and #65 submitted by the Athna Intertribal Fish and Wildlife Committee. Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery.

Oppose Proposal #64 submitted by the Cordova District Fisherman United to restrict Alaskan households gather salmon under both an Upper Cook Inlet personal use salmon fishery permit and a Chitina personal use permit during the same year.

Currently there is ample returning salmon to feed Alaskans in Cordova while allowing families who choose to access publicly owned salmon for family use in the Copper River drainage.

Personal Use fishery harvest is less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Over 500,000 sockeye and tens of thousands of kings still are reported upriver every year. Sharing salmon among Alaskans is the law within the State Constitution.

---

**Submitted by:** Josh Lyon

**Community of Residence:** np

**Comment:**

I want to see that this natural resource is well maintained but at the same time there always has to be a balance.

With the proposals of reduction of the limit to a household (proposal 60,61, and 62) this will could create a disconnection from people that actually live in the state versus people that are from out of state. People in this state live off of chitina salmon for a whole year and we don't need to reduce their yields.

As for the use of charter's in a personal dipnetter fishery I think that it is best as accessing the shores of chitina can be difficult to say the least. I oppose proposal 71 and 68 As only residents of this great State can dipnet this would create a barrier to entry to the beautiful harvest of salmon. As it takes a lot to harvest from shores of the Chitina, charters provide people an opportunity to provide for their families at a reasonable cost.

---

**Submitted by:** John MacDonald

**Community of Residence:** Portland, Oregon

**Comment:**

I would like to comment on 2 proposals -

I strongly support Proposal 5, from ADFG, that would allow the commissioner to close areas to commercial fishing with specific gear types by emergency order. Many groundfish stocks are in trouble. Without flexibility to address situations that arise during a season, unplanned lower stocks of groundfish cannot be addressed during the season. Overharvest of reduced stocks can set the harvest levels back by years, or decades with some of the longer lived groundfish.

I strongly support Proposal 14, from the Alaska Outdoor Council, to close the Alaska pollock trawl fishery in PWS unless and until the trawlers modify their gear to reduce both contact with the seafloor and the Chinook salmon bycatch is eliminated. The trawl fishery, destroys a significant amount of seafloor with every trawl. This is not good for the groundfish stocks. Chinook salmon stocks are in decline in Alaska. Sport & subsistence fishing is reduced because of bycatch.

---

**Submitted by:** Kevin Madison

**Community of Residence:** OREGON

**Comment:**

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the destructive and unsustainable commercial PWS pollock trawl fishery as specified in Proposals 14 and 16. If the Board fails to pass either of these Proposals, I would highly encourage them to consider measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.

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**Submitted by:** Maya Magee

**Community of Residence:** Homer

**Comment:**

75,76,77,78. As a commercial fisherman in PWS I feel that ensuring strong hatchery runs will benefit our wild fish and fisherman.

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**Submitted by:** Jacob Mahoney

**Community of Residence:** Chugiak

**Comment:**

I am writing to oppose proposals 63,64 and 65. The chitina personal use fishery is integral to the health of my family. Without the salmon we currently catch we wouldn't be able to afford groceries. Please oppose these proposals.

---



Dear Board Members. As a forty plus year veteran of commercial fishing in PWS and the Copper River, I would like to voice my support of Proposal #64, limiting the eligibility for obtaining a personal use permit to either the Copper River dip net fishery or the Cook Inlet fishery.

I take my personal use fish out of my commercial catch and rarely use more than 15-20 sockeye per season. With a family of 4 this number of fish was enough to allow for a winter of eating salmon fairly often. Given the generous bag limits in Cook Inlet and Copper River, a person with a PU permit in both areas and 3 additional family members could conceivably harvest 110 sockeye! Simple math says you would have to eat a little over 2 fish a week to use it all. Granted some would be shared with relatives and friends but is that the true intent of "Personal Use?" You have to be a real fish lover to consume 2 fish per week with a family of 4 and any of us who have frozen any amount of fish know that after 6 months the quality suffers. I think that one PU permit per area is still a generous gift to state residents but eligibility for both is an abuse of resources and privilege. Thanks for your time and commitment to this process and allowing users to comment.

Thanks, Ken Manning

**Submitted by:** Keith Mantey

**Community of Residence:** Cooper Landing

**Comment:**

Plan.

I also write in support of proposal 14 and recommend regulatory amendments that allow for Alaska Department of Fish and Game staff to manage the PWS pollock trawl fishery for conservation of bycatch species and important habitat under this proposal.

RE: PROPOSAL 15: 5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

If the PWS trawl fishery is not closed under proposals 14 and 16, the bycatch limits should be set to preserve the species that are bycaught and not be decided on the amount of pollock that is harvested.

RE: PROPOSAL 17: 5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

If the PWS trawl fishery is not closed under proposals 14 and 16, the fishery should have third-party onboard observers and onboard electronic monitoring to accurately verify all bycatch amounts. Currently, ADFG relies on skipper and processor data to report bycatch limits this is not an effective way to monitor.

---

Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I am a 4th generation area E salmon fisherman from Cordova. I have been gillnetting and seining for 19 years. I have been a boat owner for 9 years. I have fished nearly every fishery in Alaska and the west coast of the United States.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Sam Marchant

A solid black rectangular box used to redact the signature of Sam Marchant.

Cordova

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 1, 25, and 26 - OPPOSE**

*-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.*

*-Establish a personal use sablefish fishery in Prince William Sound.*

*-Establish a Prince William Sound groundfish personal use fishery.*

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

**SUPPORT this proposal with CDFU**

**Proposal 2 - SUPPORT**

*Reopen waters closed to the harvest of groundfish in Prince William Sound*

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

**SUPPORT this proposal with CDFU**

**Proposal 3 - SUPPORT**

*Modify Prince William Sound groundfish pot specifications*

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

**OPPOSE this proposal with CDFU****Proposal 5 - OPPOSE**

*Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.*

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

**SUPPORT this proposal with CDFU****Proposal 6 - SUPPORT**

*Allow for release of rockfish in mechanical jig and hand troll fisheries.*

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

**OPPOSE this proposal with CDFU****Proposal 7 - OPPOSE**

*Establish gear specifications for directed lingcod fisheries in Prince William Sound.*

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

### **SUPPORT this proposal with CDFU**

#### **Proposal 8 - SUPPORT**

*Modify the Prince William Sound pacific cod fishery guideline harvest level.*

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

### **SUPPORT this proposal with CDFU**

#### **Proposal 9 - SUPPORT**

*Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.*

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

### **SUPPORT this proposal with CDFU**

#### **Proposal 10 - SUPPORT**

*Modify pot limit in the Prince William Sound Pacific cod fishery.*

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.

Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

### **SUPPORT this proposal with CDFU**

#### **Proposal 13 - SUPPORT**

*Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.*

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

### **SUPPORT this proposal with CDFU**

#### **Proposal 19 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

### **SUPPORT this proposal with CDFU**

#### **Proposal 20 - SUPPORT**

*Modify the commercial fishing season for sablefish in Prince William Sound.*

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

### **SUPPORT this proposal with CDFU**

#### **Proposal 22- SUPPORT**

*Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.*

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

### **SUPPORT this proposal with CDFU**

#### **Proposal 23 - SUPPORT**

*Prohibit the retention of sablefish from state waters.*

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

### **SUPPORT this proposal with CDFU**

#### **Proposal 27 - SUPPORT**

*Modify rockfish bag and possession limits.*

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

### **OPPOSE this proposal with CDFU**

#### **Proposal 28 - OPPOSE**

*Modify the rockfish area, bag and possession limit.*



There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

**Proposal 29 - SUPPORT**

*Create additional provisions for yelloweye rockfish management.*

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

SUPPORT this proposal with CDFU

**Proposal 31 - SUPPORT**

*Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.*

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

SUPPORT this proposal with CDFU

**Proposal 32 - SUPPORT**

*Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.*

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING

SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

### **OPPOSE this proposal with CDFU**

#### **Proposal 33 - OPPOSE**

*Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.*

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

### **SUPPORT this proposal with CDFU**

#### **Proposal 34 - SUPPORT**

*Repeal the Registration Area E Tanner crab harvest strategy.*

The current Area E Tanner crab harvest strategy is unworkable, as it relies too heavily on trawl surveys and does not allow for a fishery in the majority of the PWS area. At the 2021 meeting the Area E Tanner crab harvest strategy was passed as a placeholder that allowed for a small fishery in 2022. ADFG assured fishermen that a more holistic Tanner crab harvest strategy was forthcoming, and would be presented for the 2024 meeting.

CDFU encouraged fishermen to participate in the Tanner crab test fisheries over 4 years because the ADFG stated that they needed this data to create a harvest strategy for PWS. Instead, ADFG gave us a harvest strategy which did not use any test fishery data. This created no possibility of opening some of the best fishing grounds found in the test fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 35 - SUPPORT**

*Modify the harvest strategy for Prince William Sound Tanner crab.*

At the 2021 BOF meeting, ADFG and fishermen worked together at the last minute to create a flawed PWS Tanner crab management plan. The BOF, ADFG and CDFU expressed interest in working together to create a more workable plan before the 2024 BOF meeting.

CDFU reached out to ADFG multiple times in the last year to collaborate on proposals related to PWS Tanner crab but received extremely limited input. Proposal 35 is our best attempt to create a workable harvest strategy for PWS Tanner crab that will result in a sustainable fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 36 - SUPPORT**

*Increase the pot limit in the Prince William Sound Tanner crab fishery.*

At the 2017 BOF meeting the pot limit was reduced from 75 pots to 30 pots. This was part of a large proposal by the ADFG to establish a new harvest strategy for PWS Tanner crab. No justification for the reduction was given by ADFG in their proposal or in ADFG staff comments. There was not public support for the reduction.

Pot limits should be set with input from the fleet. The pot limit reduction passed as part of a total rewrite of the Tanner crab management strategy. That harvest strategy was flawed in many ways, and working through that distracted from input on the pot reduction section.

Higher pot limits reduce handling of immature and female crabs because it increases soak times. This allows time for small crab to leave the pot via the escape rings. As we have in many different areas and other fisheries, Fishermen will ask the BOF to lower the pot limit if fishery participation increases and crowding becomes an issue from too many pots.

The small pot limit makes prospecting PWS exceptionally time consuming and expensive. Since the fishery reopened, there is a large portion of PWS, especially the outside waters, that have not been explored. Tanner crabs move in schools. They are easily missed when too few pots are spread over too large an area. This pot limit is damaging to the resource because it increases the handling of undersized crab. It also is economically damaging to fishery participants because it increases the bait, fuel, and time required to execute the fishery.

### **SUPPORT this proposal with CDFU**

#### **Proposal 37 - SUPPORT**

*Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.*

ADFG does not need the ability to adjust pot limits to manage the fishery. For instance, the length of salmon seines isn't adjusted from season to season based on run size. The daily reporting requirement in regulation allows ADFG to closely monitor the pace of the fishery and close it when there is a danger of exceeding the GHL. There is no regulation allowing adjustment to pot limits by ADFG for Southeast or Kodiak, instead static pot limits are set by the BOF. In 2022 ADFG utilized this regulation to lower the pot limit to 25. This was a significant reason the fleet was unable to harvest the GHL that season.

### **SUPPORT this proposal with CDFU**

#### **Proposal 38 - SUPPORT**

*Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.*

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries.

### **SUPPORT this proposal with CDFU**

#### **Proposal 39 - SUPPORT**

*Establish season dates for a commercial Golden King crab fishery.*

Southeast Alaska has a booming Golden King crab fishery without a fishery independent assessment.

“The Alaska Department of Fish and Game (department) evaluates stock status and establishes guideline harvest levels (GHLs) for each management area using fishery dependent data including: catch per unit of effort (CPUE), harvest and biological information (carapace length, weight, and maturity) from dockside sampling landings. No population abundance estimates are obtained for GKC stocks.” -from the Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season

Our fishermen have seen ample evidence of Golden King crab abundance. ADFG has no assessment for Golden King crab in PWS and to date has stated no intention of developing the harvest strategy current regulation stipulates. It seems that this fishery will stay closed forever without action by the BOF.

### **SUPPORT this proposal with CDFU**

#### **Proposal 40 - SUPPORT**

*Adopt a harvest strategy for golden king crab in Prince William Sound.*

Golden King crab fisheries must depend on CPUE in the commercial fishery to set its GHL, because there is no good way to survey. This proposed harvest strategy is similar to the one being used with success in Southeast.

As the fishery develops and distinct populations of Golden King crab are discovered, it will be prudent to break the area into districts. In the meantime, the statistical areas that are already in regulation allow for a reasonable starting point until the next BOF meeting cycle.

Local PWS economies are struggling following years of depressed fish prices, increased overhead costs for operations, and increased efforts of time for static harvests. It is imperative that the BOF direct ADFG to open these small scale fisheries, because they are simply not being proactively opened without BOF direction.

### **OPPOSE this proposal with CDFU**

#### **Proposal 42 - OPPOSE**

*Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.*

Crab fisheries close during the summer months because this is when crab are molting and most susceptible to mortality from handling.

We oppose the opening of a sport fishery for King or Tanner crab without also opening a commercial fishery.

**SUPPORT this proposal with CDFU**

**Proposal 43 - SUPPORT**

*Establish a directed octopus fishery in Prince William Sound.*

In recent years the GHL for PWS octopus has not been harvested but fishermen are interested in an octopus fishery.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 46, 47 - SUPPORT**

*-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.*

*-Require in season reporting in subsistence and personal use fisheries.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**OPPOSE this proposal with CDFU**

**Proposal 48 - OPPOSE**

*Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.*

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

**SUPPORT this proposal with CDFU**

**Proposal 49 - SUPPORT**

*Prohibit transport services in the Glennallen Subdistrict.*

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 51, 52, 53 - OPPOSE**

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.*

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count

reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

**SUPPORT this proposal with CDFU**

**Proposal 55 - SUPPORT**

*Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.*

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

**OPPOSE this proposal with CDFU**

**Proposal 58 - OPPOSE**

*Amend the Copper River King Salmon Management Plan.*

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**OPPOSE this proposal with CDFU**

**Proposal 59 - OPPOSE**

*Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.*

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.



**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 60, 61 - SUPPORT**

*-Modify the annual limit for the Chitina Subdistrict.*

*-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.*

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

**SUPPORT this proposal with CDFU**

**Proposal 62 - SUPPORT**

*Allow inseason adjustment of the Copper River personal use maximum harvest level.*

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

**OPPOSE this proposal with CDFU**

**Proposal 63 - OPPOSE**

*Amend the opening date of the Chitina Subdistrict personal use fishery.*

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

### **SUPPORT this proposal with CDFU**

#### **Proposal 64 - SUPPORT**

*Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.*

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

### **SUPPORT this proposal with CDFU**

#### **Proposal 65 - SUPPORT**

*Require a weekly permit and inseason reporting in the Chitina Subdistrict.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**SUPPORT this proposal with CDFU**

**Proposal 66 - SUPPORT**

*Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.*

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

**SUPPORT this proposal with CDFU**

**Proposal 67 - SUPPORT**

*Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.*

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 68, 69 - SUPPORT**

*-Prohibit dipnetting from a boat in the Chitina Subdistrict.*

*-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.*

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

**OPPOSE this proposal with CDFU**

**Proposal 70 - OPPOSE**

*Extend the lower boundary of the Chitina Subdistrict.*

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase

effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

### **SUPPORT this proposal with CDFU**

#### **Proposal 71 - SUPPORT**

*Prohibit guiding in the Chitina Subdistrict.*

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

### **SUPPORT this proposal with CDFU**

#### **Proposal 72 - SUPPORT**

*Close sport fishing for salmon based on water temperature in the Gulkana River.*

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

### **OPPOSE this proposal with CDFU**

#### **Proposal 78 - OPPOSE**

*Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.*

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

### **SUPPORT this proposal with CDFU**

#### **Proposal 79 - SUPPORT**

*Close Main Bay to all fishing during hatchery cost recovery operations.*

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

### **SUPPORT this proposal with CDFU**

#### **Proposal 80 - SUPPORT**

*-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.*

Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

**SUPPORT this proposal with CDFU**

**Proposal 81 - SUPPORT**

*Modify the area open to sport fishing near the Main Bay Hatchery.*

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

**OPPOSE this proposal with CDFU**

**Proposal 83 - OPPOSE**

*Allow a resident sport angler to use two rods when fishing for salmon.*

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

**SUPPORT this proposal with CDFU**

**Proposal 84 - SUPPORT**

*Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.*

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the

conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

**OPPOSE this proposal with CDFU**

**Proposal 85 - OPPOSE**

*Modify the bag and possession limit for coho salmon.*

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

**SUPPORT this proposal with CDFU**

**Proposal 86 - SUPPORT**

*Modify the sport fishing area and season dates in Ibeck Creek.*

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

**Proposal 87 - SUPPORT**

*Modify the sport fishing area and season in a Copper River Delta system.*

We firmly support protections for spawning coho salmon in the Copper River Delta.

**SUPPORT this proposal with CDFU**

**Proposal 88 - SUPPORT**

*Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.*

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we

must all work together to reach escapement goals and ensure future healthy salmon runs.

**SUPPORT this proposal with CDFU**

**Proposal 96 - SUPPORT**

*Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.*

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

**SUPPORT this proposal with CDFU**

**Proposal 97 - SUPPORT**

*Reduce the minimum herring spawning biomass threshold.*

Biomass thresholds are normally set based on a population's unfished size. There are now 30 years of population estimates where no fishery occurred. This data should be used to set fishery limits and exploitation rates.

The PWS and Gulf of Alaska ecosystems have changed drastically in the last 30-50 years, and will continue to change. There is no reason to keep the herring fishery closed until it achieves those historical population numbers. Environments are ever-changing and managers need to have an ability to adapt to outdated management strategies.

**SUPPORT this proposal with CDFU**

**Proposal 98 - SUPPORT**

*Align Prince William Sound herring and salmon management area descriptions.*

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

**Proposal 99 - SUPPORT**

*Define commercial herring fishery districts in Prince William Sound.*

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

**SUPPORT this proposal with CDFU**

**Proposal 100 - SUPPORT**



*Adopt a Kayak Island District herring management plan.*

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

**Proposal 102 - SUPPORT**

*Allow commercial fishery permit holders to harvest herring for the own use as bait.*

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

**Submitted by:** Fred Marinkovich

**Community of Residence:** Gig Harbor, Wa

**Comment:**

I am writing in SUPPORT of proposals 56 and 57. Dual permits, also known as permit stacking. I am the author of proposal 57. I was involved with the adaption of this type of proposal in Bristol Bay. It has worked very well there since inception. It has also been a positive tool in the Cook Inlet drift fishery. I will be attending the BOF meetings in Cordova, and am looking forward to discussing the benefits my proposal with all of you. Thanks for your time, Fred Marinkovich F/V KERRY

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**Submitted by:** Fred Marinkovich

**Community of Residence:** Gig Harbor, Wa

**Comment:**

BOF Board,

I would like to OPPOSE proposals #51, #52, #53, and #78. As an area E commercial drift fisherman with three children that are looking to eventually take over my fishing business, these four proposals would negatively effect the future of our fishery. Thank you for your time, I will be available for discussion at the BOF meeting. Fred Marinkovich F/V KERRY

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**Submitted by:** Rosemarie Martell-Greenblatt

**Community of Residence:** Fairbanks

**Comment:**

Dipnetting for Salmon in the Copper River feeds my family and many friends who cannot fish for themselves.

Please do not allow commercial interests and greed to interfere with our right to feed ourselves. # 47 The fishing is so sporadic that it may take multiple fishing trips to obtain the harvest limit. Reporting should be done as it is now, when the fishing is completed. Resources for escapement numbers are solid, why would ADFG want to spend their time counting harvest numbers multiple times in a season ?

# 48 I need and depend on commercial services to take me up and down the river to fish from shore. Please do not interfere with this greatly needed and appreciated opportunity to subsist.

I OPPOSE the following Proposals

44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

I SUPPORT the following Proposals

48,51,52,53,58,59,70

Thank you for your attention to these important matters for ALL Alaskans.

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November 26, 2024

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

Dear Members of the Board of Fisheries,

I have been a commercial salmon drift fisherman in Cook Inlet for 53 years. Also have also seined lower Cook Inlet and have crewed in PWS salmon seining.

Alaska commercial salmon fishermen decades ago voluntarily and financially took over hatcheries and hatchery operations from the State FRED division and more efficiently raised salmon for all user groups and helped stabilize the yearly economic viability, and activity of the commercial fishing industry and communities.

An egg take reduction of any amount is not warranted. There is no valid scientific data to justify any reduction. This proposal 78 for egg take reduction has been before the BOF before and was appropriately rejected. There is no new information and is once again proposed by anti-hatchery people, just using unproven theories, to create the slippery slope of making the hatchery associations unable to be financially sound. Hatcheries would close. Hatchery projects on improving and protecting habitat and invasive species irradiation and management would cease.

Less salmon for all users and many sports fisheries that were created by aquaculture associations enhancement projects, would also cease. The permitted egg take allotments per hatchery has been thoroughly and scientifically vetted and approved by ADF&G, their genetic department, RPT, the hatcheries Board of Directors and others. Most processors in Cook Inlet also process salmon from PWS to help them be profitable. Reducing salmon production in PWS especially on poor return years increases the likelihood of processors going out of business or leaving PWS and Cook Inlet which would be economically devastating to the commercial fishing industry and communities.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

**Please review the following reasons why the Board should oppose and reject Proposal 78:**

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

**Impacts of Proposal 78:** Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

David Martin

[REDACTED]

Clam Gulch, Alaska

**Submitted by:** Timothy Mason

**Community of Residence:** Valdez

**Comment:**

Limit early season commercial harvest of Copper river salmon to ensure the resource can sustain subsistence and personal use harvest.

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**Submitted by:** Bill Mathis

**Community of Residence:** Anchorage

**Comment:**

I fully support the Alaska Outdoor Council's (AOC) Proposal #14 to close the PWS walleye pollock pelagic trawl fishery until the trawler fleet can guarantee they won't disturb the ocean floor bed. State protection of the seabed ecosystem in Alaska waters is a conservation concern to AOC and myself.

Dragging trawling gear along the seabed to gather fish is not sustainable nor in the best interest of the public's resource. Our fisheries' have been damaged enough already through commercial fishing. The crazy needs to stop if we are to expect our fisheries to survive.

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**Submitted by:** Paul Matter

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

**Comment:**

As an annual personal use fisher on the Copper and sometimes Kenai I do not want to see restrictions to my family's use of the sockeye and king resource. I am opposed to proposals 49,50,60,61,62,63,68 &71. I support proposal 58. I trust ADFG's biologists to manage our fisheries and am Leary of proposals submitted by commercial fishing interest. I have seen too many resource grabs and public restrictions from the commercial fishing industry to trust their motives in resource protection.

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**Submitted by:** Kiril Matveev

**Community of Residence:** Area E Permit holder

**Comment:**

I'm writing and voting for the votes here on the behalf of the future of the fishing industry of area E. And how we are being suffocated by outside forces on our way of our lifestyle choices. We have never went out our way to attack other people's incomes. Always been on the defensive side. All we want is to be left alone and make a living how it always was for the past 30 yrs. Thank you

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Märit Carlson-Van Dort, Chair  
Alaska Board of Fisheries  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
[marit.carlson-vandort@alaska.gov](mailto:marit.carlson-vandort@alaska.gov)

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I started fishing PWS and the Copper with my dad when I was 5 years old. I've been running my own bowpicker for 14 years, and bought into seining in 2022.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Brandon Maxwell

A solid black rectangular box used to redact the signature of Brandon Maxwell.

Cordova

**OPPOSE this proposal with CDFU****OPPOSE this proposal with CDFU****Proposals 25 and 26 - OPPOSE**

*-Establish a personal use sablefish fishery in Prince William Sound.*

*-Establish a Prince William Sound groundfish personal use fishery.*

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

**SUPPORT this proposal with CDFU****Proposal 31 - SUPPORT**

*Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.*

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

**SUPPORT this proposal with CDFU****Proposal 32 - SUPPORT**

*Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.*

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

### **OPPOSE this proposal with CDFU**

#### **Proposal 33 - OPPOSE**

*Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.*

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 46, 47 - SUPPORT**

*-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.*

*-Require in season reporting in subsistence and personal use fisheries.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**OPPOSE this proposal with CDFU**

**Proposal 48 - OPPOSE**

*Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.*

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

**SUPPORT this proposal with CDFU**

**Proposal 49 - SUPPORT**

*Prohibit transport services in the Glennallen Subdistrict.*

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**OPPOSE this proposal with CDFU**

**Proposals 51, 52, 53 - OPPOSE**

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Reduce commercial salmon fishing opportunity in the Copper River District.*

*-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.*

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

**SUPPORT this proposal with CDFU****Proposal 55 - SUPPORT**

*Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.*

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

**OPPOSE this proposal with CDFU****Proposal 58 - OPPOSE**

*Amend the Copper River King Salmon Management Plan.*

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**OPPOSE this proposal with CDFU****Proposal 59 - OPPOSE**

*Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.*

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

**SUPPORT this proposal with CDFU****SUPPORT this proposal with CDFU****Proposal 60, 61 - SUPPORT**

*-Modify the annual limit for the Chitina Subdistrict.*

*-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.*  
 If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

### **SUPPORT this proposal with CDFU**

#### **Proposal 62 - SUPPORT**

*Allow inseason adjustment of the Copper River personal use maximum harvest level.*  
 We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

### **OPPOSE this proposal with CDFU**

#### **Proposal 63 - OPPOSE**

*Amend the opening date of the Chitina Subdistrict personal use fishery.*

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The

final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

**SUPPORT this proposal with CDFU**

**Proposal 64 - SUPPORT**

*Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.*

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

**SUPPORT this proposal with CDFU**

**Proposal 65 - SUPPORT**

*Require a weekly permit and inseason reporting in the Chitina Subdistrict.*

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

**SUPPORT this proposal with CDFU**

**Proposal 66 - SUPPORT**

*Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.*



Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

**SUPPORT this proposal with CDFU**

**Proposal 67 - SUPPORT**

*Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.*

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

**SUPPORT this proposal with CDFU**

**SUPPORT this proposal with CDFU**

**Proposal 68, 69 - SUPPORT**

*-Prohibit dipnetting from a boat in the Chitina Subdistrict.*

*-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.*

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

**OPPOSE this proposal with CDFU**

**Proposal 70 - OPPOSE**

*Extend the lower boundary of the Chitina Subdistrict.*

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

**SUPPORT this proposal with CDFU**

**Proposal 71 - SUPPORT**

*Prohibit guiding in the Chitina Subdistrict.*

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already

exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

### **SUPPORT this proposal with CDFU**

#### **Proposal 72 - SUPPORT**

*Close sport fishing for salmon based on water temperature in the Gulkana River.*  
Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

### **OPPOSE this proposal with CDFU**

#### **Proposal 78 - OPPOSE**

*Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.*  
There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

### **SUPPORT this proposal with CDFU**

#### **Proposal 79 - SUPPORT**

*Close Main Bay to all fishing during hatchery cost recovery operations.*

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

### **SUPPORT this proposal with CDFU**

#### **Proposal 80 - SUPPORT**

*-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.*

Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

**SUPPORT this proposal with CDFU**

**Proposal 81 - SUPPORT**

*Modify the area open to sport fishing near the Main Bay Hatchery.*

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

**OPPOSE this proposal with CDFU**

**Proposal 83 - OPPOSE**

*Allow a resident sport angler to use two rods when fishing for salmon.*

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

**SUPPORT this proposal with CDFU**

**Proposal 84 - SUPPORT**

*Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.*

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

**OPPOSE this proposal with CDFU**

**Proposal 85 - OPPOSE**

*Modify the bag and possession limit for coho salmon.*

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

### **SUPPORT this proposal with CDFU**

#### **Proposal 86 - SUPPORT**

*Modify the sport fishing area and season dates in Ibeck Creek.*

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

#### **Proposal 87 - SUPPORT**

*Modify the sport fishing area and season in a Copper River Delta system.*

We firmly support protections for spawning coho salmon in the Copper River Delta.

### **SUPPORT this proposal with CDFU**

#### **Proposal 88 - SUPPORT**

*Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.*

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

### **SUPPORT this proposal with CDFU**

#### **Proposal 96 - SUPPORT**

*Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.*

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with

the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

**SUPPORT this proposal with CDFU**

**Proposal 97 - SUPPORT**

*Reduce the minimum herring spawning biomass threshold.*

Biomass thresholds are normally set based on a population's unfished size. There are now 30 years of population estimates where no fishery occurred. This data should be used to set fishery limits and exploitation rates.

The PWS and Gulf of Alaska ecosystems have changed drastically in the last 30-50 years, and will continue to change. There is no reason to keep the herring fishery closed until it achieves those historical population numbers. Environments are ever-changing and managers need to have an ability to adapt to outdated management strategies.

**SUPPORT this proposal with CDFU**

**Proposal 98 - SUPPORT**

*Align Prince William Sound herring and salmon management area descriptions.*

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

**Proposal 99 - SUPPORT**

*Define commercial herring fishery districts in Prince William Sound.*

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

**SUPPORT this proposal with CDFU**

**Proposal 100 - SUPPORT**

*Adopt a Kayak Island District herring management plan.*

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

**Proposal 102 - SUPPORT**

*Allow commercial fishery permit holders to harvest herring for the own use as bait.*

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

**Submitted by:** Brandon Maxwell

**Community of Residence:** Soldotna

**Comment:**

I strongly oppose gear stacking

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**Submitted by:** James Mayor

**Community of Residence:** Ester

**Comment:**

Oppose: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72

Support: 48, 58, 59, 70

I generally oppose any proposal that limits personal use and gives more to commercial fishing fleets.

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**Submitted by:** David Mays

**Community of Residence:** Palmer

**Comment:**

In general, I oppose any new restrictions or reductions made to the PU fishery. I and my family do depend on this as a food source here. With the high inflation we have seen, food security is becoming a real issue here in Alaska. There are far too many families like mine that depend on this resource, and it is wrong to take it away.

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**Submitted by:** Peter Mazeika

**Community of Residence:** Pleasant Grove, Utah

**Comment:**

I am very concerned about props 86,87 & 88. My wife and I and children and grandchildren and friends (14 to 16 people) and I have been coming to Cordova and sport fishing for salmon for the past 22 years. We come out in September every year on the third full week that starts on a Sunday. Next year we will arrive on 9/21/25 for a full week of fishing. We prefer to fish the Eyak, but also fish the Ibek, the culverts, and the Alaganik especially when the Eyak is running high and difficult to fish which is common. We both fly fish and spin cast depending upon the conditions. These proposed changes would dramatically impact our sport fishing experience and if implemented would cause us to stop our trips to Cordova. It is important to understand that sport fishing continues until at least the end of September. The 24-36 hr. commercial openers in recent years are also very negatively impacting our experience on the Eyak. In 2024 there were very few fish after the opener. Thank you.

**Submitted by:** Paul McCabe

**Community of Residence:** Kodiak ak

**Comment:**

Hi, my name is Paul McCabe, I am the captain of the fishing vessel Nichole out of Kodiak Alaska. I've been fishing out of Kodiak for 15 years, where my wife, children and I are residents. We fish out of Kodiak nine months a year and tender salmon in PWS for 60 days in the summer. My 2 oldest sons have been tendering on my boat since they were only 4 years old. They also go out on fishing trips with me from time to time as this is their future legacy. I have been fishing the Nichole for 5 years in the sound along with our other boats the Chellissa, the Dawn and Mardel Norte. It is very important income at the beginning of the year for all of our families and all of our crew. We have installed electric monitoring on our boats.pws is our only option that time of the year and we all rely on that income from PWS. I oppose Proposals 14, 15, 16, and 17. Thanks for taking the time to read this.

**Submitted by:** Thomas McCall

**Community of Residence:** Fairbanks

**Comment:**

I participate in the charter dipnet fishery on the Copper River. This is a wonderful opportunity that I would like to see continue. We Alaskan's are extremely fortunate to have these resources. Commercial fisheries are notorious for overfishing and depleting fish populations, including the Atlantic herring and salmon. I support proposals 58,59, and 70. I oppose 61,62,63,64,65,66,67,68,69.

November 24, 2024

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

Dear Board of Fisheries,

I am from Homer, Alaska, and I participate in the Prince William Sound seine fishery. Alaska salmon hatcheries have allowed me to make a living and provide for my family, both financially and as a food source. A 25% decrease in revenue would put me in a difficult position to keep my business afloat, and with the rising cost of maintenance, I would be concerned that I wouldn't be able to keep my vessel in safe working order.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

**Economic Significance of Hatcheries:** Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

**Preserving Access for All User Groups:** Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

**Sustainability and Responsible Management:** Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both

major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,  
Connor McCarthy

[REDACTED]

Homer, Alaska