

Submitted by: Lisa McConarty

Community of Residence: Wasilla

Comment:

60 oppose- do not take half of our food

61 oppose- do not reduce our food

62 oppose

63 oppose- do not give commercial fishers a 6 week opportunity to wipe out our food supply

64 oppose- they come from different bodies of water

65 oppose- unrealistic, people work

66 oppose- not a terminal harvest area

67 oppose- you've clearly never tried this

68 oppose- I can't tell if this is real. Are we being punked? You're trying to get rid of charters.

69 oppose- trying to get rid of charters

70 support- gives 700 yards to charters for safety

71 oppose- charters are the safest way to dipnet in Chitina

44 oppose- you're either working or you're not

45 oppose- commercial fishers are taking enough of our kings, they shouldn't get more

46 oppose- unrealistic

47 oppose- unrealistic

49 oppose- these belong to the people of Alaska

50 oppose- why would you oppose a life saving device?

54 oppose- NO! My God, they are wiping out enough of our fish!

55 oppose- another attempt to get rid of charters

Proposal 1

I strongly support this proposal, currently legal subsistence gear for sablefish may lead to a high exploitation rate of long lived low productivity deep water rockfish. This gear change has been used to reduce bycatch and predation rates of sablefish fisheries throughout Alaska. Furthermore, due to the large increase in sablefish populations more efficient gear is warranted in PWS sablefish fisheries.

Proposal 14

I strongly oppose this proposal. The Prince William Sound trawl fishery was created to increase survival rates of salmon in PWS. The result of this fishery was to make salmon fisheries in PWS viable. Furthermore the King Salmon fishery in PWS remains healthy, with catch rates that are among the highest in the state. There is no evidence that supports the assertion that the PWS trawl fishery has any impact on king salmon returning to the interior of the state. However there is significant evidence that this fisheries has actually increased the amount of salmon available to all user groups.

Proposals 18, 19

I strongly support these proposals. Unless a biological reason for closing a fully rationalized fishery exists, allowing harvest for the longest period of time allows permit holders to maximize the value of the fishery.

Proposal 25

I oppose this proposal. A subsistence fishery for sablefish is available to all Alaska residents, therefore this proposed fishery is unwarranted.

Proposal 32

I support this proposal. I have personally caught thousands of small Dungeness crabs incidentally in the drift gillnet fishery. It seems likely that a viable fishery could be established. Due to budget cuts ADF&G does not continue to survey the crab population in the Cordova area. A limited fishery could yield important biological data and allow for better management of the resource.

Proposal 45

I support this proposal. Current regulations allow upriver subsistence users easy access to Chinook salmon using fish wheel and in river gillnet (commonly called dip net) gear, with these users being last to be limited in times of low run strength. Allowing downstream users similar access to the fish makes sense, especially given the disparity in household limits.

Proposal 46

I support this proposal, reporting subsistence harvest is essential for proper management, especially in times when the commercial fishery is not open.

Proposal 48

I oppose this. The use of guide services for subsistence fishing is illegal statewide, therefore this is a redundant regulation, however the guided "subsistence" fishery on the Copper River is an upriver, unregulated commercial gillnet fishery, when down river commercial and personal use fisheries are restricted historically the commercial abusers of the subsistence allocation continue their commercial activities under the guise of subsistence fishing. Should the statewide ban be repealed rejecting this proposal will ensure that upriver commercial fisheries face similar restrictions to the regulated commercial fleet.

Proposal 49

I oppose this proposal, this is a clear attempt to cut access to state subsistence fisheries off from the general public. Ahtna corporation owns a majority of land along the Copper River leading severe problems in public access. Publicly available areas to engage in non guided subsistence fishing are very small. This could also have unintended consequences such as the use of traditional bartering to bring people to their traditional fishing sites.

Proposal 50

I oppose this proposal. This is silly, chartplotters are not useful in river fishing.

Proposal 51

I strongly oppose this proposal.

The literature cited by the proposal actually suggests the opposite of the assertion of the proposers saying it is important to exploit all parts of the run equally. By arbitrarily closing the commercial fishery early in the season the exploitation rate of late season runs will be greatly increased, greatly reducing biodiversity of the Copper River red salmon run threatening the overall success of the run.

As an area-e drift gillnet holder I rely on the high prices that we get for early season salmon, early season restrictions have the most impact on commercial users as the price of sockeye decreases up to 80% over the course of a given season.

Arbitrarily restricting a fishery is contrary to the mission of ADF&G and the board of fisheries as this is not changing the allocation of the copper river red salmon but saying that ADF&G staff are to stupid to manage for the objectives in the management plan adopted by the BOF.

In conclusion this proposal threatens the viability of the commercial fishery, the economic stability of the city of Cordova, and the ability of all users to continue to sustainably harvest red salmon in the Copper River drainage. This is a dangerous proposal and must not be enacted.

Proposal 52

I strongly oppose this proposal. Arbitrarily restricting the copper river commercial fishery has no basis in sound management, and would have an outsized impact on the viability of commercial fishery. The current management regime allows an additional 12 hour period to the commercial fishery than what is being proposed, and even in years with extraordinary catch rates (like 2024)

the fishery is closed until management objectives are made. In-river objectives have been reached even in years with very low commercial exploitation. It is not the fault of the commercial fleet or ADF&G commercial managers that fish are not getting from the sonar station to the Gakona or Slana reach of the Glennallen subdistrict. Removing tools from in river managers is inappropriate, and threatens the future sustainability of the Copper River for all user groups.

Proposal 53

I strongly oppose this proposal. Arbitrarily restricting the copper river commercial fishery has no basis in sound management, and would have an outsized impact on the viability of commercial fishery. The current management regime allows an additional 12 hour period to the commercial fishery than what is being proposed, and even in years with extraordinary catch rates (like 2024) the fishery is closed until management objectives are made. In-river objectives have been reached even in years with very low commercial exploitation.

Proposal 54

I strongly support this proposal. As a recent entrant to the area e drift gillnet fishery my ability to fish the Copper River district is highly dependent on weather. By allowing increased opportunity to harvest fish inside of the barrier islands, fishermen like me with less expensive smaller boats will have equal opportunity to fish when the weather is bad.

Proposal 55

I oppose this proposal. I would prefer that fishing guides be limited with better tools such as non resident sport fishing restrictions, residency requirements for guides, or limited entry for guides. I would however support an amendment to this proposal limiting commercial guide services in the personal use fishery. These are commercial gillnet fisheries with virtually no regulatory oversight, and allow less than ten people to harvest around 40% of the personal use harvest.

Proposal 58

I oppose this proposal. In 2023 ADF&G greatly limited the commercial fishery due to king salmon management concerns. A better management tool would be to allow openings of the inside waters of the Copper River district.

Proposal 59

I oppose this proposal as written. If liberalization of the Chitna “diptnet” (dipnets used in this fishery are actually in giver set gillnets) P/U fishery occurs it is likely that the increased fishing pressure will largely target enhanced fish from the Gulkana hatchery, which regularly does not meet broodstock goals. While allowing increased access to the fishery may be warranted a clause should be added that the department shall manage the Chitna “dipnet” fishery to ensure that broodstock and corporate cost recovery goals are achieved.

Proposal 60

I support this proposal. Currently the only management tool that the department has for ensuring the Chitna “dipnet” (in river gillnet) fishery remains in the allocated range is to reduce fishing time, a more fair way to reduce exploitation is to reduce limits per household. If this proposal is paired with proposal 59, and 58 the department would have the most authority to best manage the fishery.

Proposal 61

I support this proposal. Initially limiting the P/U “dipnet” (in river gillnet) fishery at the beginning of the season and allowing ADF&G to modify the limits based on run strength is sound management and should be enacted.

Proposal 62

I strongly support this proposal. It is essential that all users share the burden of conservation.

Proposal 63

I support this proposal. This is a much better solution to the problems that proposal 51, 52 and 53 attempt to address. It is clear that the fish needed in the upper reaches of the Copper River to meet subsistence objectives are passing the miles lake sonar and not getting to the upper river. It is likely that the mortality of these fish is from the Chitna “dipnet” (in river gillnet) fishery.

Proposal 64

I support this proposal. Overcrowding in PU fisheries is a huge problem. This proposal would limit over crowding and all PU users a more efficient and better experience.

Proposal 65

I support the spirit of this proposal. I think the department of fish and game in consultation with the department of law could amend this proposal to make in season reporting mandatory. Currently the only way to limit the fishery is through reducing fishing time and to stay within the allocation limit timely data on harvest is essential to proper management of this fishery.

Proposal 66

I support this proposal. As someone who directly funds the Gulkana hatcheries and PWSAC I find it disgusting that the hatchery I fund cannot get brood stock regularly because the fish I pay for personally are caught by people who do not pay a dime for management of our natural resources. It is essential that this is passed. This is in the best interest of all user groups, including PU and subsistence users.

Proposal 67

I support this proposal. Unfortunately too many king salmon are killed by dragging them onto rocks so they can flop around and bloody themselves so they can be released. The point of a dipnet is to allow easy release of non target fish such as king salmon and steelhead. Safely releasing a salmon from a dipnet is very easy, and if it is not that is because the gear that is in the dipnet fishery is not a dipnet but indeed a gillnet.

Proposal 68

I support this proposal. Boat based PU fishing in the Chitna subdistrict is dominated by a handful of commercial operators. Make no mistake these operators are unregulated commercial gillnet fishermen. By my calculations 10 guides working 60 days with 6 clients each catching an average of 15 fish catch 54,000 salmon or over $\frac{1}{3}$ of the entire allocation. To allocate 10 people $\frac{1}{3}$ of the allocation is insane. By eliminating boat based fishing you will ensure that all Alaskans have equal access to the fishery, reduce unwanted mortality on king salmon, and ensure that the PU fishery stays within their allocation.

Proposal 69

I support this proposal. By granting managers ability to restrict boat based dip netting they will have more tools to allow access to the fishery in times of low numbers, benefitting all Alaskans.

Proposal 70

I oppose this proposal. Unfortunately a limited number of guides catch a large amount of fish and crowd out locals. If the Chitna Dippnetters Assn was concerned with crowding they would move to limit the number of guides.

Proposal 71

I strongly support this proposal. Each guide working on the river a modest season for 60 days with a modest number of clients of an average of 4 per day each catching 15 fish are responsible for harvesting 3600 fish per season. 3600 is approximately 2.4% of the allocation. These numbers are modest and it seems likely that they are a vast underrepresentation of the actual numbers of salmon harvested by guides. They will argue that their clients are doing the catching, however I would assert that my deckhands do not catch fish while we are commercial fishing. It is similar when I am a guide, clients on my boat are fishing as a team with me, and each fish a client catches is one that I am directly responsible for. As a fishing guide I take that responsibility seriously. If there are 10 guides in the Chitna subdistrict with the modest success rate I describe above that means approximately a quarter of the allocated salmon are being caught directly by 10 people. Those 10 people do not pay a dime towards management of the resource, do not even need to be able to participate in the fishery (be a resident). Because the department refuses to collect any data on the impact of guiding on this fishery we can only estimate. I think it is likely that up to half of the allocated fish are caught by 10 people. Allowing this to happen is an affront to all Alaskans and to users who value the skills and traditions needed to successfully harvest salmon. As a commercial fisherman who has invested hundreds of thousands of dollars to commercially exploit Copper River salmon it is offensive to me that a single guide can harvest a similar number of salmon as me, for commercial gain with no regulations or requirements.

Proposal 72

I oppose this proposal as written. Sockeye salmon in the Gulkana River are primarily hatchery fish, therefore increase protection is unwarranted, furthermore sockeye salmon are not catch and release. Furthermore it seems likely by closing salmon fishing anglers would target rainbow

trout and grayling which are also susceptible to high water temperatures and are required to be released.

I would support regulatory language that allows catch and release fishing restrictions due to high water temperatures such as those enacted in Montana and other western states.

Proposal 75

I do not support this proposal. As an area e drift gillnet permit holder I worry about the ability of the seine gear group to catch PWSAC WNH chum salmon which are often the most economically viable run for the drift gillnet fleet.

Proposal 76

I support this proposal, by slightly increasing the ability of drift gillnet permit holders access to Port Chalmers the drift gillnet fishery is much more viable, whereas by restricting the seine fleet from the subdistrict the economic impact on seiners is much lower, as seiners have access to the AFK chum fishery, VDA pink salmon fishery, cost recovery contracts, and gillnet tender contracts early season. These opportunities are not afforded to gillnetters and thus a slightly higher allocation threshold is warranted and fair. It is my understanding that many seiners avoid Port Chalmers all together, and that it fishes much better with drift gillnet gear.

Proposal 77

I strongly support this proposal. Allowing the drift gillnet fleet to benefit from VDA indirectly is only fair to commercial users of PWS.

Proposal 78

I strongly support this proposal. I am sure I am in the minority among fishermen however by reviewing available literature and observing data from 40 years of PWS salmon runs it seems clear that the limiting factor in the run strength is not the egg to smolt survival of pink and chum salmon. Reducing the amount of pink salmon smolt in the north pacific can only have positive benefits for all user groups. It seems likely that this will not have a measurable affect on biomass returning PWS, larger fish are generally more valuable in the marketplace therefore fewer larger fish are more valuable than more numerous smaller fish. Furthermore it is likely that the amount of pink salmon in the north pacific is negatively affecting king, red and silver salmon stocks. Reducing the number of eggs taken do not necessarily mean a reduction in fishery value. I think it would actually benefit the commercial fishery.

Proposal 79

I oppose this proposal, however would strongly support an amended proposal. Unfortunately this proposal does not address the problem adequately and ties manager's hands when things such as the gillnet fleet needing to clean out some fish.

Currently the state of the sport and subsistence fishery in the Main Bay AGZ, THA and SHA is two fold:

First cost recovery operations are not feasible on weekends, which are the best time to commence cost recovery operations because of the longer closed period of the gillnet fleet, however the amount of sport and subsistence fishermen in main bay has gone to the point where cost recovery simply cannot take place, as subsistence is open on saturday and there is increased boat traffic on weekends. It is essential that the department have the authority to close and restrict these fisheries to allow for timely and efficient cost recovery. Unfortunately this proposal seems to only restrict the commercial fishery, and the department already has the authority to close the commercial fishery to ensure cost recovery.

The second problem is the amount of legally set commercial fishing gear hit and destroyed by the sport fishing fleet going into Main Bay to harvest sockeye salmon during cost recovery operations. This season the Main bay subdistrict was closed for much of the season to allow for cost recovery, unfortunately this meant that the number of sport fishing boats transiting the gillnet fleet fishing in the Crafton Island subdistrict was at an all time high. Unfortunately sport fishing boats generally do not understand how gillnets are set and many nets were destroyed causing tens of thousands of dollars in damage. By reducing the time that sport fishing is open we can solve this problem.

To fix these problems I suggest the following regulatory changes, these do the same thing as proposal 79, except the allow additional sport fishing times allowing for maximum flexibility and usage by sport fishermen in times that would minimize conflicts with other users:

5 AAC 01.610 (g)

(new section) except (salmon may not be taken) in the Main Bay Hatchery AGZ, SHA, or THA from the commencement of cost recovery and broodstock collection operations until the end of those operations for the season. Or by emergency order.

5 AAC 55.023

(new section) Waters of Main Bay west of a line from 60°32.26'N lat, 148°04.85'W long to 60°31.88'N lat., 148°04.03'W long. Are closed to sport fishing on Mondays, and Thursdays in June and July unless opened by emergency order.

5 AAC 55.023

(New section) Waters of Main Bay west of a line from 60°32.26'N lat, 148°04.85'W long to 60°31.88'N lat., 148°04.03'W long. Are closed to sport fishing for salmon between the hours of 1 am and 6 pm from Jun 10-July 15 unless opened by emergency order.

Proposal 80:

I strongly support this proposal. The increase in sport fishing pressure at the Main Bay hatchery has cost the gillnet fleet hundreds of thousands of dollars in lost fishing time because cost recovery cannot be done efficiently, and because of sport fishing boats damaging legally set

gear. This proposal would give the department authority to manage the fishery accordingly. I prefer the proposed regulations put forward in my comments on proposal 79 because it allows for more predictable regulations for sport fishermen.

Proposal 81:

I support this proposal.

Patrick McCormick

Submitted by: J.R. McCulley

Community of Residence: Burlington, Iowa

Comment:

This comment is being made in favor of proposal 14 5 AAC 28.263 concerning trawlers in Prince William Sound. I know I am not a resident but I have noticed a sharp decline in the quality of my fishing trips over the past 15 years. I am all for a healthy commercial fishing industry but these trawlers are destroying populations of 100's of species. Please consider eliminating or severely limiting their use. Thank you for your time.

Best Regards

Submitted by: Kristy McCullough

Community of Residence: Anchorage

Comment:

I fully support banning bottom trawling, a destructive fishing method, from Alaska waters.

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 commercial fisherman. Alaska's salmon hatcheries have greatly benefited me over the years. Proposal 78 would result in less income for me, as it would lead to fewer fish available for harvest. Additionally, the drift fleet would no longer be able to split as much between the Copper River and Prince William Sound, which would further hurt our earnings.

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.

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.

Sincerely,

Jerry McCune

A solid black rectangular box used to redact the signature of Jerry McCune.

Cordova, Alaska

Madam Chair & Board Members,

As an Alaskan resident that utilizes the Copper River Personal Use Fishery annually to feed my family, it is extremely disheartening to see the PU continuedly being attacked at every Board of Fish meeting cycle. Access to this fishery is already difficult, and safe access options are limited. Charter boats provide a safe access option for residents who choose to utilize their services because of their experience, skills and continued safe practices. Dipnetting from a boat on this river provides access for individuals and families that would otherwise not be able to physically harvest salmon from this fishery. All Alaskans deserve the right to harvest salmon, and they especially deserve the right to harvest salmon safely.

As a charter boat operator in this fishery, I can attest firsthand just how quickly a life can be taken due to unsafely trying to access the river. Every year I assist the AK State Troopers with search and rescues and body recoveries. Those that operate charters have more experience and skills than anyone else on the Copper River and never miss a beat to assist those in need. Beyond the help and safety that the charter operators provide, the numbers provided by ADF&G simply speak for themselves. In a fishery where permit holders utilizing charters take around 13% of the overall number of fish taken in this fishery, one simply cannot say there is a salmon problem because of charter boats. Alaskans should have safe access to these fish before anyone else, and proposing that smaller bag limits, less permits and further reporting restrictions should be put on us is truly anti-Alaskan.

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

I SUPPORT PROPOSALS: 48, 58, 59 & 70

Respectfully,

Erica McDaniel

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 an Alaskan salmon fisherman for over 50 years. Every year in either southeast, Bristol Bay, Kodiak, and now Prince William Sound. I have mostly been a seiner, but gilletted in Bristol Bay for 10 years.

Hatcheries have increased harvest opportunities for my business a lot. They have balanced the harvest in good years and in poor years. Reducing hatchery production would reduce the chance that my business can make a profit and stay in business.

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,

Robert McDonnell

[REDACTED]

Valdez, Alaska

Submitted by: Bree McDougall

Community of Residence: Eagle River

Comment:

My name is Bree McDougall. I'm a military spouse, Anchorage School District Educator, & mother of three. I moved to Alaska in the Summer of 2019 & first used the Copper River subsistence fishery in 2021 with AK eXpeditions dip net charter. We have fished every summer since then with AK eXpeditions, making 2024 our fourth year.

Fishing with AK eXpeditions is a highlight of our summer. I have fished with my husband & with my teenage son, & our entire family helps to process our catch. We eat salmon every week throughout the year which reduces grocery bills. We proudly share with friends & family when they visit Alaska. We also love the security of a freezer full of food that we harvested & which we know to be all natural. We would never be able to achieve this without AK eXpeditions making it realistic for us to share in the many natural blessings of Alaska.

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

Submitted by: John McDougall

Community of Residence: Eagle River

Comment:

My name is John McDougall. I am a 29 year military veteran, husband and father of three. I moved to Alaska in the Summer of 2019 and first used the Copper River subsistence fishery in 2021 with AK eXpeditions dip net charter. We have fished every summer since then with AK eXpeditions, making 2024 our fourth year.

Fishing with AK eXpeditions is a highlight of our family summer. I have fished with my wife and with my teenage son and the entire family helps to process our catch. We eat Salmon every week throughout the year which reduced grocery bills. We proudly share with friends and family when they visit Alaska. We also love the security of a freezer full of food that we harvested and which we know to be all natural. We would never be able to achieve this without AK eXpeditions making it realistic for us to share in the many natural blessings of Alaska.

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

November 24, 2024

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

Dear Board of Fisheries,

I live in Seward, Alaska, and have worked in the Alaska seafood processing industry for 35 years. I am currently an IFQ holder. Vessels and crews rely on multiple fisheries to sustain the economics of their operations. Without hatcheries, other fisheries will suffer. Hatcheries produce food from the ocean, and we cannot replace that resource with proteins produced on land. There simply isn't enough land, and increasing land farming would have a far worse impact on the environment than aquaculture. In a time of so much climate change, which is causing uncertainty in all food supply chains, why is reducing such a well-established supply of protein even being considered? The carbon footprint of harvesting hatchery fish is far less than other fisheries. The fish come to one place and can be harvested without boats having to spend fuel searching for fish and hauling them back to a place to tender or process. Hatcheries provide a large volume in one very small area, which reduces the carbon footprint in multiple ways. By letting the fish free-range, you do not have the problems that occur in closed-pen fish farming. The community of Seward would be greatly affected if the cannery cannot get enough pink salmon to stay open. The plant provides employment, freight in and out of the community, fish tax, sales tax, retail stores, electrical use— all generating revenue for both the city and the citizens who own the businesses.

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:

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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,
Charles Mceldowney

[REDACTED]
Seward, 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

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 been fishing for 10 years. Entered the industry as a kid looking for a check to sustain and found an incredible career that offers an opportunity to provide for a life of growth, and satisfaction.

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,

Andrew McFadden

A solid black rectangular box used to redact the signature of Andrew McFadden.

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

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: Andrew McFerron

Community of Residence: Stayton, OR

Comment:

I fully support complete 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.

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

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've owned an Area E permit and boat for 10 seasons. I'm also part of the commercial brine shrimp fishery on the Great Salt Lake in winter months.

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 Meredith

[REDACTED]

Chokosna, 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 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

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

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

Submitted by: Michael Metcalf

Community of Residence: Anchorage

Comment:

Dear board, in 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. If you feel that harvest is needed to be restricted restrict the use of commercial trawlers and the by catch that they wantingly waste

Oppose Proposal #63 and #65

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

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 for 35 years. I have owned and operated a drift gillnet permit since 2000. I have set-netted and drifted for salmon, and long-lined black cod in PWS. It is getting harder to make a living in this business.

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,

Jason Metz

[REDACTED]

Soldotna ak

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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

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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: Mike Mickelson

Community of Residence: Cordova

Comment:

November 26th, 2024

Alaska Board of Fisheries

Board Support Section

ATTN: BOF Comments

PO Box 115526

Juneau, AK 99811-5526

RE: Opposition to Proposals 5/14/15/16/17/51/78

Dear Chairwoman Carlson-Van Dort,

I'm a life long resident of Cordova, grew up subsistence fishing and helping out at our family lodge that offered some sport fishing. I've been commercial fishing for 20 years. I attached my .pdf comments, which include ADF&G's summary, CDFU's, and UFA's. I didn't agree with anyone all the time.

Thanks for the opportunity to comment,

Mike Mickelson

Table 1

		ADFG	CDFU	UFA	Mike Mickelson	
1	Pot gear black cod	N/S	O		Oppose	A fully allocated resource
2	Pot gear closed waters)	S		Support	The department cites concerns about slinky pots in the currently closed areas due to potential interaction with tanner crab. Many of the areas open for fishing have populations of Tanner crab.
3	Pot specs	N/S	S		Support	
4	Rockfish ghl	N	O		Oppose	I applaud the intention of this proposal, but I don't think this is the way to do it.
5	Close waters rockfish	S	O	O	Oppose	
6	Release of rockfish	S	S		Support	
7	Gear specs for pws ling cod	N	O		Oppose	See CDFU's comments on this.
8	P-cod gear type	N	S			
9	p-cod gear allocation	N/S	S		Support	
10	p-cod pot limit	N/S	S		Support	
11	p-cod allocation shift	N/S			Support	
12	Increase P-Cod allocation for jig and pot	N/S			Support	
13	Increase skate bycatch limits	O	S		Support	The department would retain EO authority to shut down commercial harvest of skate.
14	Close PWS pollock trawl	O	N	O	Oppose	I think the better way to deal with the problem the proposer brings up is to lower the trip limit to 200,000 lbs and tighten the bycatch restrictions, or leave the trip limit as it is and require an observer. They have been catching a lot of kings in the last few years according to the data in ADF&G's comments. With the bycatch concerns about rockfish that needs to be addressed as well. The trawl fleet needs to do better.

15	Modify bycatch limits in pws trawl	O	N	O		I agree with the sentiment of this proposal, but I would like to reference the departments comments. I think we need to move away from using only poundage figures with bycatch, and try to get better estimates of the number of fish taken as bycatch. I understand that when you spill a trawl bag on deck, especially one thats full, it gets hard to count individuals. A mechanism that distinguishes whether there are 100 five lb king salmon verses 200 2.5 lb kings, vs 20 25lb kings would be extremely helpful in evaluating the bycatch impacts of the trawl fishery.
16	Close PWS trawl fishery	O	N	O		
17	Establish observer requirements in PWS trawl	O	N	O	Oppose	It is unclear whether the Alaska Board of Fisheries has the authority to mandate electronic monitoring. I support observer coverage for a small portion of the fleet.
18	Extend dates PWS black cod	N				
19	Modify season for PWS black cod	N	S			
20	Modify season for PWS black cod	N	S		Support	
21	Concurrent use of longline and pot gear	S			Support	
22	Concurrent use of longline and pot gear	S	S		Support	
23	Prohibit Black Cod state waters	N	S		Support	
24	Lengthen black cod season	N			Support	
25	Establish black cod personal use	N/S	O		Oppose	
26	Establish PWS ground fish personal use	N/S	O		Oppose	
27	Modify rockfish bag and possession	S	S		Support	

28	Modify rockfish area, bag and possession	O	O		Oppose	
29	Create provisions for yellow eye management	S	S		Support	
30	Increase subsistence tanner crab pot limit	N			Support	
31	Repeal tanner closed waters	O	S		Support	
32	Reopen pws dungy	O	S		Oppose	
33	Community based shellfish permit	N	O		Support	
34	repeal tanner harvest strategy	O	S		Oppose	
35	Modify tanner harvest strategy	O	S		Support	
36	Increase tanner pot limit	O	S		Support	
37	30 pot tanner limit	O	S		Oppose	
38	Tender tanners	O	S		Support	
39	Establish golden king fishery	O	S		Oppose	
40	Harvest strategy for golden king	O	S		Support	
41	Adopt new king and tanner harvest strategies	O			Support	
42	Open sport king crab, liberalize tanner P/U	O	O		Oppose	
43	NEW PWS octopus fishery	N	S		Support	
44	Use portion of commercial net for subsistence	O			Support	Currently our subsistence harvest is limited by total number of fish. If a net longer than 50 fathoms is onboard a vessel participating in a subsistence fishery a marker bouy should be attached to the corkline at the 50 fathom mark, or 1 shackle of gear may be used (50 fathoms).

45	Inside closure removal subsistence	O			Support	I support this proposal with addition of Saturday only added to the language. Enforcement starts to get complicated if the inside is open for subsistence, while a commercial fishery is being prosecuted outside the king closure line, which ADF&G included in their comments.
46	Reporting 7 days after CR subsistence harvest	N	S		Support	Even if ADF&G doesn't currently have the tools to take advantage of this data, it builds the a record, and I'm sure will be pertinent in the future.
47	Inseason reporting Subsistence and Personal use	N			Support	ADF&G doesn't currently have the tools to take advantage of this data, it builds the a record, and I'm sure will be pertinent in the future.
48	Allow subsistence Guiding, glenallen subdistrict	N	O		Oppose	Guiding is at odds with the definition and practice of subsistence.
49	Prohibit transport services in Glenallen subdistrict	N	S		Support	Guiding is at odds with the definition and practice of subsistence.
50	Prohibit fishfinders	O				I support the intention of this proposal, but this will be very hard to enforce.

51	Reduce CR commercial opportunity	N	O	O	Oppose	I think there is some question as to whether the Park Service has the authority to put in proposals such as these, as they are a federal agency tasked with managing federal lands. At a minimum this proposal should be moved to the statewide meeting, as it will have statewide impacts on who has authority over the waters of Alaska. My comments on 52 and 53 will address the portion of the proposal directed at the commercial fishery.

52	Reduce CR commercial opportunity	N	O		Oppose	I oppose proposals 52 and 53. There have been multiple years, with 2013 being the standout example, where the ice was very late going out, the river temperature stayed low, the counter went in late and the run was very strong. It can take 2 weeks for salmon to go from waters that open for commercial fisheries to the counters location at the first choke point on the Copper. There can be hundreds of thousands of fish in the river system and they wont be recorded until days later because of this lag time. The red run especially is a shining example of good management, only missing the escapement goal 1 year out of the last 20, with most years putting more fish than are required into the river system. The department has been cautious with their early season openers, keeping them short duration unless indices, including the commercial fleets performance, indicate more time is warranted.
53	Limit CR early opportunity	N	O		Oppose	
54	Restrict CR inside closure	O			Oppose	I agree with some of what the proposer is saying. The commercial fleet has been significantly cut back from access to inside fishing. However when small king occur and our ability to make escapement is in doubt, keeping the inside closed is the right move.
55	Tie guide closure to CR commercial closure	N/O	S		Support	The commerical fleet shouldn't have to bear all the burden of conservation

56	Permit stacking drift	N	N		Support	There are a lot of good arguments for and against permit stacking. The strongest for it is keeping the number of participants down to a level that the fishery is profitable. However, if these proposals are anything like the seine permit stacking results, if passed, the permit prices will skyrocket and that will be a barrier to entry to one of the few fisheries in Alaska that is the gateway to commercial fishing boat and permit ownership. I'm supporting both of these permit stacking proposals, but its a close call, and I'm hoping these proposals are discussed in the committee of the whole.
57	Dual permit drift	N	N		Support	See comments on 56
58	Amend CR king management plan	S	O		Oppose	Since there is a subsistence fishery upstream of this personal use fishery I do not believe the personal use increase is warranted.
59	Amend CR P/U dipnet management plan	S	O		Oppose	See comments for 58
60	Modify annual limit for Chitina Subdistrict	N	S		Support	The personal use fishery was created for times of surplus on the Copper. A few years ago the board decided to use the same limits as the personal use fisheries on the Kenai. While I understand this was in an effort to reduce complexity, I don't think it was warranted here, especially since there is a substance fishery upriver of the personal use fishery.
61	Change limit, supplement permit Chitina	N	S		Support	See comments on 60

62	Allow in season adjustment CR personal use	N/O	S		Support	
63	Amend P/U opening date	O	O		Support	The run timing on the Copper seems to be getting later based on catches of the commercial fleet. The P/U opening date should reflect this.
64	Prohibit CR P/U and any other P/U permit	O	S		Support	We should be following the example of hunting regulations, and require personal use fisherman to pick place they would like to do their harvest at.
65	Weekly permit and in season reporting Chitina subdistrict	N	S		Support	Even if ADF&G currently does not have the ability to use this data now, they will be able to in the future. Reporting is much easier than it once was with increased connectivity.
66	Manage P/U fishery to achieve Gulkana Brood	O	S		Support	Everyone wins when Gulkana gets its full broodstock. There are more fish for all uaergroups than their would be otherwise.
67	Prohibit removing kings, if release	O	S			
68	Prohibit dip netting from boat	O	S		Support	The upriver subsistence community has been raising this issue for a long time. They aren't getting their fish. The commercial fleet and biologists are making sure we are getting fish put into the river system, frequently at levels above escapement goals. The personal use fishery has exceeded their 150000 fish allocation several years, and this proposal would address that to some degree..
69	Establish restrictions boat dipnetting	O	S		Support	

70	Extend chitina Subdistrict	N	O		Oppose	See ADFGs comments. This proposal is unlikely to ease congestion. The Chitina Subdistrict has already been over their allocation in the past several years. I'm especially opposed since there is subsistence fishery upstream of the personal use fishery.
71	Prohibit guiding Subdistrict	O	S		Support	
72	Close sport fishing on Gulkana, water temp	O	S		Support	I'm glad this is being brought up. I don't think this proposal has all the answers, but hopefully it prompts discussion that generates solutions to catch and release mortality in waters that are warming.
73	Permit stacking PWS seine	N	N		Oppose	
74	Permit stacking PWS seine	N	N		Oppose	
75	Amend PWS management plan	N	N		Oppose	
76	Amend PWS management plan	N	N		Oppose	
77	Include VFDA in management plan	N	N		Oppose	
78	Reduce Hatchery production by 25%	O	O	O	Oppose	There is no scientific consensus that this proposal will address. If there were easy answers to why king salmon size and productivity are declining in some areas of Alaska, the state would already be pursuing them. The language in this proposal, or very similar language has been addressed by the board of fisheries at every meeting for this region for at least the past 15 years. In all of the hatchery committee meetings and regular board meetings and work sessions for the Board of Fisheries, there has never been any meaningful peer reviewed scientific evidence that has supported this proposal or ones very similar to it. The board has

89	Increase bag limit for burbot	S				
90	Modify burbot bag limit	O				
91	Modify seasons for grayling	S				
92	Modify bait closure	S				
93	Modify closed area	S				
94	Repeal Bow and arrow	S				
95	Numerous changes in commercial herring management	N/O			Support	
96	Herring management dates/ bait fishery allocation	N	S		Support	
97	Reduce minimum herring spawning threshold	O	S			
98	Align PWS herring and salmon descriptions	S	S		Support	
99	Define commercial herring districts	S	S		Support	
100	Adopt kayak island herring management plan	S	S		Support	
101	Exploratory herring fishery pws	O			Support	
102	Herring for use as bait	S	S		Support	
103	Dual permit herring purse seine	O				

PC417

Submitted by: Steve Miedzwiadok

Community of Residence: Anchorage

Comment:

I oppose proposal nos. 63, 64, and 65. Every citizen of Alaska should be able to participate in these fisheries!

PC418

Submitted by: Joshua Miles

Community of Residence: Wasilla

Comment:

I support proposals 51 and 52. In recent years sport, personal use, and subsistence fishermen have been restricted in fishing for king salmon despite commercial users already harvesting thousands of king salmon. To protect king salmon, all user groups should be minimizing harvest which requires a more conservative approach for early season commercial fishing.

PC419

Submitted by: Debbie Miller

Community of Residence: Sitka, Alaska

Comment:

Dear Board of Fish,

As a 50-year Alaskan who has explored the wonders of Prince William Sound many times, I support Proposal 16. The State of Alaska should immediately close Prince William Sound to the trawling of walleye pollock, along with the many other species of bycatch fish that are harmed or killed by this unsustainable fishery. Southeast Alaska banned trawling years ago. The State of Alaska should follow suit. Please protect the marine resources of Prince William Sound by closing this destructive fishery.

Thank you,

Debbie S. Miller

Sitka, Alaska

Author of A Wild Promise: Prince William Sound (Braided River, 2018)

Submitted by: Mel Miller

Community of Residence: Kenny Lake

Comment:

Access to the salmon fishery is vital to my family's food security. The ability to provide fish to feed my family gives me pride and a sense of independence. I do not have to rely on anyone to provide food for my family. The ability to access this fishery in a safe manner from a boat is critical to maintaining my access to food.

These are the proposals I support and oppose.

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

Thank you.

Proposal 15: In light of the recent and ongoing by catch issues with trawling, I am thoroughly in support of any proposal that would prevent the issues occurring elsewhere from occurring here. I also support the wisdom of the local native communities and their ability and intent to protect the conservation of our resources while making sure all benefit from them.

Proposal 16: Recent research has shown that pelagic trawls spend a significant amount of time in contact with the bottom. This, obviously, does damage to the bottom ecosystems that are so necessary for the health of the entire ocean and the sustainability of all our fisheries. This information, combined with bycatch information, leads me to believe that it is not the most advantageous way to harvest our fisheries.

Proposal 17: We should have methods of observing and ensuring accurate reporting of all fisheries.

Proposal 18: There is no biological reason for the current closure dates of the sablefish fishery and expanding the sablefish harvest period to align with the halibut harvest period would eliminate waste and allow for more efficient harvest.

Proposal 19: I do not support this proposal because the proposed legislation and wording is unnecessarily complicated and would make it more difficult for fishermen to legally participate in the fishery.

Proposal 21: I support this proposal. In recent years, longliners have had increasing issues with whale depredation. Allowing the use of pots and hooks concurrently would reduce the amount of fish lost to whales and save the fishermen time, money, and effort while further conserving the resource.

Proposal 22: See above

Proposal 46: I support this proposal. In season harvest reporting would better inform ADF&G during the time in which they can take action on management.

Proposal 47: Support. This would make it easier to report catch in season and promote compliance with regulation. However, may come at additional cost to the state which should also be considered.

Proposal 48: Oppose. Our subsistence fisheries are supposed to be subsistence. The commercialization directly contradicts the goal of these fisheries not being for the profit of anyone and accessible to the communities that depend on them.

Proposals 51, 52, and 53: I oppose these proposals in their current form because they place the full burden of conservation on commercial fishermen. If changes to the current management scheme need to be made, they should be made to equitably affect all user groups equally instead of just targeting one user group.

Proposal 55: I support this proposal. Any commercial use of the fisheries should certainly be treated equally and this proposal would promote that. There shouldn't be upstream commercial use of the fishery if the downstream commercial harvest is restricted for conservation measures.

Proposal 64: I support this proposal. Commercial fishermen must decide at the beginning of the year what commercial salmon harvest they want to partake in and cannot partake in multiple different salmon fisheries within the state. This should also apply to personal use fishermen.

Proposal 66: Support. The other hatcheries in the area have the ability to restrict harvest when necessary. This should apply to all the hatcheries.

Proposal 67: Support. The research shows that removing salmon from the water before releasing them significantly affects their survival chances. The regulations should be updated to follow the best science and conservation recommendations.

Proposal 73 and 74: I support this proposal with edits. Allowing one person to hold two permits and use the extra length net is more fair to the fishermen who don't have children or crew members that they can trust to hold an extra permit for them. Currently, the recent changes to the regulations have allowed for one person to own two permits with one being in someone else's name. This requires a great deal of trust in that second individual to not steal the permit. However, the allowance in the text for the length of purse seine gear to be restricted by emergency order does put undue burden on the fishermen. No one would be able to change the length of their net mid season and therefore this emergency order would just prevent those fishermen from participating in the fishery and would be entirely unnecessary as ADF&G no longer manages harvest efficiency, only time and area.

Proposal 75 and 76: I oppose these proposals. The facts that the gillnetters who have written these proposals state do not align with the reality that the seiners have gotten the Chalmers Subdistrict the last two years according to the allocation plan. Also, their insistence that they receive Chalmers if they get 50% or less of the revenue would put them over their allocation of Prince William Sound Salmon.

Proposal 77: I oppose this proposal. VFDA is not a PWSAC hatchery and does not receive any of the enhancement tax paid on its fish. Since the allocation plan specifically has to do with PWSAC fish, it should stay solely based on PWSAC fish. Additionally, considering that VFDA does not receive its share of the enhancement tax, the gillnetters are already receiving more than their fair share of the revenue as the VFDA enhancement tax is redistributed to the PWSAC hatcheries and therefore tax taken on seiners' salmon is used to enhance the gillnetters' harvest. This proposal also is not "inclusive" and "including the value of all enhanced salmon" as Bowen states as it does not include the enhanced Copper River runs.

Proposal 78: I oppose this proposal. As Umphenour states, there is a "lack of conclusive evidence that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying". While I am happy to support any

changes that must be made for conservation measures in accordance with our state constitution, I am not happy for our fisheries to be the science experiment that we use to determine what should or should not be done on this large of a scale. Additionally, as Umphenour notes, we are not the only producers of hatchery fish in the North Pacific. Russia produces much more hatchery fish than the entire state of Alaska does, so to even suggest that our hatcheries would have a large enough impact to be of statistical significance in just 5 years is asinine.

Our hatcheries support our state and communities through much more than just commercial harvest. They also allow our communities to feed themselves and support a huge industry and commercial sport fishing.

VFDA has also rightfully pointed out that such an experiment would destabilize not only our hatcheries, but also the entire seafood industry. Such an experiment could only be entertained if we could ensure that our hatcheries, fishermen, and processors could survive it to benefit from the findings on the other side.

Proposal 85: Oppose. Harvest limits in hatchery areas where there is a surplus of cohos is already higher than 3 per day and 3 in possession, we shouldn't be making changes to harvest limits right after ADF&G had to use emergency orders to reduce harvest limits due to an unprecedented lack of salmon. Additionally, harvest limits for conservation reasons should not be amended to suit the finances of businesses.

Proposal 88: Support. The burden of conservation should be shared equitably by all user groups. Therefore, if returns are low enough to cause an extended closure of commercial fishing, restrictions should also be placed on other user groups. Additionally, using catch and release as a conservation tool relying on the survival of the salmon is not supported by research.

Rowan Miller

Thane Miller



Valdez, Ak 99686

November 25, 2024

Alaska Dept. of Fish and Game

Alaska Board of Fisheries

Dfg.bof.comments@alaska.gov

Chairman Carlson-Van Dort, Alaska Board of Fisheries

Prince William Sound Meeng , Cordova, Alaska

Ground fish proposals:

Proposal #1 Support with a limit of one pot per boat of not more than 3'x6'x 2'.

Proposal #2 Support

Proposal #3 Support

Proposal #4 Oppose

Proposal #5 Oppose. The harvest of rockfish has seldom exceeded the GHL over the last 20 years and is generally far below it.

Proposal #6 N/C

Proposal #7 Oppose

Proposal #8 Support

Proposal #9 Support

Proposal #10 Oppose

Proposal #11 Oppose

Proposal #12 Oppose

Proposal #13 N/C

Proposal #14 Oppose. Pollock in PWS is a healthy fishery and significantly reduces the number of predators on other species such as salmon. ADFG has stated that western Alaska chinook stocks do not mix with the Gulf stocks. While western Alaska fish stocks are a real concern, this jumping on the bandwagon approach is obscuring the real issues and doing real harm.

Proposal #15 Oppose

Proposal #16 Oppose

Proposal #17 Support with a change to match federal requirements.

Proposal #18 Support. The season was originally limited because an ADFG biologist at the me (Mr. Bertcelli, my apologies for misspelling his name) thought it would be easier for biologists to sample the catch if the season was shorter. The first proposal was to restrict the season to five days. The catch sampling behind this recommendaon has not been carried out by ADFG. There is currently no biological reason to restrict the season. Orca avoidance is a very good reason to extend the season.

Proposal #19 Oppose. This proposal is unnecessarily complicated and onerous to manage.

Proposal #18 is a much bea er soluon .

Proposal #20 Oppose. This proposal might have merit if the change read “beginning *and ending* concurrently with the Federal IFQ Sablefish fishery” rather than ending on August 31.

Proposal #21 support

Proposal #22 support

Proposal #23 Oppose

Proposal #24 Support

Proposal #25 Oppose. Proposal #1 with a one (1) pot per boat limit is a better, simpler solution.

Proposal #26 Support. See my comments on proposal #1

Proposal #27 Support with the addition of a harvest permit such as that for the sport/subsistence/personal use shrimp fishery and a requirement for mandatory reporting of harvest.

Proposal #28 Oppose

Proposal #29 N/C

Shellfish Proposals:

Proposal #30 Support

Proposal #31 Support

Proposal #32 Support

Proposal #33 Oppose vigorously

Proposal #34 Support

Proposal #35 Support

Proposal #36 Oppose

Proposal #37 Support

Proposal #38 Support

Proposal #39 Support

Proposal #40 Support

Proposal #41 ??????

Proposal #42 Support. The proposal as written is too restrictive in annual bag limit of Golden King Crab. I suggest raising it to 5.

Proposal #43 N/C

Copper River Salmon Proposals:

Proposal #72 Support

Commercial Fishing Permits, Allocation Plan and Hatchery operations

Proposal #73 Support. The part that reads “*except that, in times of conservation, Purse Seine Gear may be restricted to an aggregate length of 225 fathoms*” must be deleted.

Shortening a seine is not quick or simple, and must be done on the beach or it risks the boat being in violation of aggregate on-board gear limits. ADFG already has measures in place to limit harvest.

Proposal #74 Support. The part that reads “*except that, in times of conservation, Purse Seine Gear may be restricted to an aggregate length of 225 fathoms*” must be deleted.

Shortening a seine is not quick or simple, and must be done on the beach or it risks the

boat being in violation of aggregate on-board gear limits. ADFG already has me and area to limit harvest.

Proposal #75 Oppose.

- The 2006 allocation policy took years to negotiate, and despite some of the alternative fact quoted, the gillnet fishery is doing well by comparison.
- The Allocation policy does not include all enhanced fish because the Gillnet fleet did not want to share the abundance of the Copper River and its enhancement program.
- Including all enhanced salmon into the policy means dragging Valdez Fisheries Development Association runs into the fray. The gillnet fleet does not and has never contributed, participated or supported the VFDA runs. They do however take the money. Enhancement taxes paid on VFDA fish average over \$380,000 per year, approximately \$7 million over the life of the allocation plan so far. That money is collected and split between the two user groups at PWSACC. None of the money goes to support the operations of VFDA.
- The Port Chalmers Remote Release was originally created as a program for the Seine Fleet and was reallocated after years of lobbying and negotiations.
- Proposal #75 does not take into account the Set Gillnet allocation and harvest.
- The end result will de facto eliminate the Allocation policy because under no conditions will Port Chalmers revert back to the Seine Fleet. This is clearly an attempt to take something that wasn't theirs to begin with.

Proposal #76 Oppose. See comments under Proposal #75

Proposal #77 Oppose.

- The Gillnet fleet and the author of #75 and #76 strenuously opposed bringing all enhanced fish into the Allocation Policy until nearly twenty years later when conditions in the Gulkana system and the Gulkana hatcheries production have changed enough to reduce their impact on the gillnet income. Now they want throw out the baby with the bath water.
- Enhancement Taxes paid on VFDA fish average over \$380,000 per year, approximately \$7 million over the life of the allocation plan so far. That money is collected and split between the two user groups at PWSACC. None of the money goes to support the operations of VFDA.
- In fact, there is not much to share. PWSAC hatcheries are doing a terrible job producing fish. And the markets for the fish they do produce, to be blunt, suck.
- The fact of the matter is, the industry is in a desperate situation. Neither the Seine fleet nor the Gillnet is making any money, and the author wants to fight over the scraps. Proposals #75, #76, and this one will be the nail in the coffin of much of the Seine Fleet.

Proposal #78 Oppose.

- The author is not attempting remedy a new situation as he implies, but rather is grinding an ax that he has had since the early 1990's that is purely economic in nature. In the early 1990s, it became unprofitable to market chum salmon from the Yukon due to a market collapse brought on by the Exxon Valdez Oil Spill. Due to this collapse, the author

experienced hardship and began to acknowledge chum production in Prince William Sound and in Southeast Alaska. The current proposals are just a continuation of those acknowledgments. Now with the production on the Yukon River in real, genuine trouble, the author is using that as an excuse to continue his 30 year history of complaints.

- This proposal has already failed by a 6 to 1 vote of the Board of Fish.
- This proposal was pulled from the from the Kodiak meeting because it didn't conform to regulations.
- This proposal and others like it have tried using the regulations found at 5AAC24.370, 5AAC40.820, and 5AAC 24.363-370 as arguments and have failed. They even invented 5AAC40.1xx and failed.
- This proposal, in this form and others, has been repeatedly rejected because there is no causal evidence to support their conclusions for the decline in Western Alaska Salmon stocks.
- ADFG's Salmon Ocean Ecology Program confirmed that there is little to no interaction between South Central and South East Alaska hatchery production and Eastern Bering Sea salmon stocks.
- This proposal makes the case itself for rejection. *"All those proposals have been refused on the basis of lack of evidence that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying."*
- There is no evidence to support the author's conclusions as evidenced by both ADFG and the hatchery operators.
- The results of approving this proposal are predictable.
- The Salmon Industry would not survive. Hatchery cost would not go down but revenue would. The First cut at Valdez Fisheries Development Association would be to the Coho program that produces as many as 100,000 coho per year, mostly for the sports fishermen. At loss of 100 jobs and \$14 million in revenue to local business. Next to be cut would be plans to replace our long term rearing building dates to the early 1980's. After that everything would fall like dominos.
- The fishing fleet depends on hatchery production to compliment wild production, without it they starve.
- The processors will go the same way.
- The situation in western Alaska is dire. The climate is changing. I hope that the locals realize that they need hatcheries on the Yukon River if for no other reason to save the genetic stocks because once they're gone.

Proposal #79 Support

Proposal #80 Support

Proposal #81 Support

Proposal #82 Oppose

Proposal #83 Oppose

Proposal #84 Support

Proposal #85 Oppose

Submitted by: William Miller

Community of Residence: Homer

Comment:

I am in full support of proposal 14,15,16&17. The pollack travel fishery rules need to be revised. Critical habitat is being destroyed and massive bycatch associated with trawling is destroying and limiting Alaskan residents food source.

Submitted by: Marlene Minnette

Community of Residence: Eagle River

Comment:

As a lifelong born & raised Alaska Cup'ig Inuit who has been fishing for salmon for my families long winters & has a daughter who is being taught my way of living, I have to say I oppose the checked mark proposals. Reasoning is, I live in the Urban community of Eagle River, where I cannot harvest my salmon, but have to travel to Chitina & utilize fishing charters as they are the safest means of transportation, rather than myself standing on the shores where the current is swift. I am not a wealthy person who owns a boat but can definitely afford a charter where I know, the captains know the rivers & knows safety. I cannot fly to my hometown due to it being expensive. My daughter & I rely on this fishing every summer & have for the last 12 years. If this is taken away, then you will be taking away our yearly winter food of dried fish & fish being put away for cooking. So please consider those that can't afford to buy salmon from a local grocery, a boat or a flight home.

Submitted by: William Minnette

Community of Residence: Eagle river

Comment:

My wife and daughter are both native, and are not able to go to her village every year to subsistence fish, access to the copper river is of utmost importance to us, and that access is provided by charters. It has become tradition for us to go fish the copper, and doing so by charter has exponentially increased the safety of our yearly trip. Also, lowering the numbers of the permit is taking food out of the mouth of alaska natives and I strongly oppose that, and taking food out of any alaskans mouth.

Submitted by: Stuart Mitchell

Community of Residence: Anchorage, AK

Comment:

I support eliminating the indiscriminate fishing method of trawling in PWS. Bycatch is not monitored by on board observation. There are alternative methods which have almost no bycatch available to harvest the targeted stocks.

Submitted by: Michael Moody

Community of Residence: Chitina

Comment:

I do not represent Chitina Emergency Medical Services, however I have been serving the Chitina area as a volunteer EMT for 30+ years.

I oppose proposal 71. The guide services in CPUDF have been extremely beneficial helping Chitina EMS fulfill our abilities to help people in need along the river.

Every summer we respond on their boats, which are ready 24/7 during the busiest time in the season. Most of our responses are to people that are shore fishing. The guide services help transport medics and patients. Sometimes they have retrieved bodies and rescued people that have fallen in the river. Many people are coming to fish in Chitina from all over Alaska. Many for the first time. I want an experienced boat captain to take our patients and medics up and down the river.

I support proposal 51 as a subsistence user in Chitina. A hard look at the numbers shows the largest harvest comes from the commercial harvest near the mouth and restrictions here seem necessary.

Thank you.

November 24, 2024

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

Dear Board of Fisheries,

I am from Sitka, Alaska, and I am writing to express my opposition to Proposal 78. I am a commercial fisherman and have trolled commercially for salmon since 1970. All three of my children and nine grandchildren have also commercial fished for salmon. I was involved in the formation of one of the first PNPs in the 1970s and have since served on the boards of directors of both regional and private associations over several decades. My family has greatly benefited over many years from the hatchery production of kings, cohos, pinks, and chums. Sometimes, over half our annual income has come from targeting hatchery production. My two sons are also professional fishermen, and one of them paid his way through college by fishing hatchery-produced chums.

Over dozens of seasons, I've witnessed the rise, decline, and resurgence of productivity in both hatchery and wild riparian systems. I've consulted with fisheries scientists, oceanographers, hatchery managers, fisheries managers, state, federal, and Canadian experts, as to what causes these fluctuations. The answer? There are many variables in ocean conditions that affect the success of a wild run or hatchery program, including predators, temperatures, forage fish conditions, ocean currents, and fisheries bycatch, to name a few. Any one or combination of these factors can have a huge effect on a return. The best science looks at the whole picture over the long term, considering all factors without prejudice. The kind of research that is subtly agenda-driven and confuses correlation with causation should not be used to justify radical actions like this proposal, which could cause social and financial harm for uncertain, unmeasurable benefits.

For the Alaska Board of Fisheries to take on the responsibility of setting egg take limits would undermine confidence in the process. These decisions are currently made by professionals whose jobs depend on ensuring they uphold Alaska's constitutional mandate to preserve and protect wild salmon. Such decisions should never be made by untrained, overworked political appointees who are pressured by special interest groups. I do not fish in Prince William Sound, but if a proposal such as this were imposed in the Southeast, I believe it would be a severe blow to independent fishing families that compose most of the fleet. The small communities that depend primarily on fishing would be especially vulnerable in this time of economic uncertainty. Please review the following reasons why the Board should oppose and reject Proposal 78:

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,
James Moore



Sitka, Alaska

Submitted by: Kyle Moore

Community of Residence: Anchorage

Comment:

There is ample fish run for AK residence to use the subsistence dip net permits. And subsistence dip netters take less than 10% of the harvest. It should not be restricted.

PROPOSAL 78

5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

OPPOSE

I oppose this proposal on several levels.

1. Attributing the decline in Chinook salmon stocks on ocean carrying capacity is an assumption that is not scientifically supported. In-river habitat degradation by increased sport fishing pressure has been well documented for decades as a significant cause for decreasing Chinook returns. The river systems cited in Proposal 78 are the very rivers that have experienced exponentially increased sport fishing pressure in the last 20+ years. Without adequate healthy spawning habitat, it is impossible for any salmon to reproduce, much less to be affected by outside factors.

2. Prince William Sound (PWS) hatchery production is a vital component of Alaska's fishing economy. Having salmon seined in Prince William Sound since 1991, I have been observed a multitude of young people work their way through college by fishing and continued their family's fishing legacy. Alaskan families, fishermen, crew members, businesses and communities rely on PWS hatchery production to maintain viable fisheries.

3. To reduce PWS hatchery production based on undocumented assertions of ocean carrying capacity would be irresponsible. Decisions should be based solely on science that takes into consideration all factors including the following: ocean carrying capacity, habitat degradation, water temperature, bycatch, intercept fisheries, diseases and hatcheries. ALL fishery management should be based on scientific and biologic considerations rather than supposition!

I am strongly opposed to Proposal 78. To make a 25% reduction in PWS hatchery production without adequate scientific data is NOT in the best interest of the resource, the fishery or the State of Alaska and its residents. Furthermore, it would create a devastating financial hardship for commercial fishermen, crew members, processors, businesses and local communities, especially after the recent economic impact due to severely decreased salmon prices coupled with diminished harvest.

Margaret Moore

Submitted by: Alfonso Mora

Community of Residence: Matanuska Borough

Comment:

I highly oppose proposal 89 to up the limit of burbot on Lake Louise. That lake has an ever increasing pressure from sport fishermen especially due to such easy road access. The lake also has excessive bycatch due to Patrick Hankins and Kodi Straight commercially whitefish gill netting. I also feel ADF&G has insufficiently studied the watershed to justify the increased limit of burbot.

Submitted by: Victoria Mora

Community of Residence: Matanuska Borough

Comment:

I strongly oppose Proposal 89 to increase the burbot bag limit on Lake Louise. The lake is already experiencing growing pressure from sport anglers, largely due to its easy road access, which raises concerns about overfishing and the long-term sustainability of the fishery. Additionally, excessive bycatch from the commercial whitefish gill netting operations by Patrick Hankins and Kodi Straight is further stressing the ecosystem. Furthermore, I believe ADF&G has not conducted sufficient research on the watershed to justify increasing the burbot limit, and any such change would be premature without a more thorough understanding of the lake's ecological health and fish populations.

Submitted by: Fletcher Morrison

Community of Residence: Homer, Ak

Comment:

I Fletcher Morrison and my family are in favor of proposal 73 & 74.

I have owned a double permit for 2 seasons. I have been able to transfer my second permit into a crews name using the medical transfer process due to my wife being pregnant with our second child.

Usually my wife fishes with me., however she has taken some seasons off to raise our children. Soon the medical transfer option will not be a Reality to us. And we would have to either sell the permit or trust a crew member enough to transfer the permit into their name.

Allowing one captain to hold 2 permits in their name would greatly streamline the pre season process , by removing notary's and brokers. It would also remove future uncertainty, if captains did not have to have a game plan for their second permit due to paperwork obligations.

The buy back program is working as planned by reducing the number of boats fishing the sounds. I vote for keeping it simple and allowing one person to hold 2 permits in their name.

PC434

Submitted by: David Mueller

Community of Residence: Wasilla

Comment:

Most measures proposed are by big Corp entities that will impact small businesses and communities, limiting Alaskan resident's ability to harvest their own food.

PC435

Submitted by: Rhonda Mueller

Community of Residence: Wasilla

Comment:

Most measures proposed are by big Corp entities that will impact small businesses and communities, limiting Alaskan resident's ability to harvest their own food.

PC436

Submitted by: Kelsey Mueller

Community of Residence: Palmer

Comment:

Most measures proposed are by big Corp entities that will impact small businesses and communities, limiting Alaskan resident's ability to harvest their own food.

Submitted by: Kyle Mueller

Community of Residence: Palmer

Comment:

Most measures proposed are by big Corp entities that will impact small businesses and communities, limiting Alaskan resident's ability to harvest their own food.

Submitted by: Wyatt Mueller

Community of Residence: Wasilla

Comment:

Most measures proposed are by big Corp entities that will impact small businesses and communities, limiting Alaskan resident's ability to harvest their own food.

Submitted by: Robert Muessig

Community of Residence: West Union, South Carolina

Comment:

I have been coming to Alaska every year to fish for salmon since 2010, except for 2 Covid years. I am 76 years old and I believe that inriver salmon fishing is a resource that needs to be preserved for my children and grandchildren and all future generations. If this means limiting commercial harvests then so be it.

Submitted by: Richard Mallowney

Community of Residence: Anchorage

Comment:

I oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat. This is one user group trying to exclude another user group when there is abundant fish for everyone

Submitted by: Sean Nadeau

Community of Residence: Gakona

Comment:

Adoption of #51. I live on the Gulkana River and have spent my life on the Gulkana. My father's and Uncle's ashes were spread on the river. In the last 10 years, there hasn't been what we would call a normal run of either Reds or King Salmon.

The population of Reds returning to Fish Creek is a fraction of what they used to be. Over the last 10 years, the micro-management of the King Salmon fishery has been a disaster. My lodge has lost money every year since 2015. Almost every guide and lodge along the Richardson Highway has gone out of business. A complete way of life is nearly lost. I worry that my daughter will never have the experiences that I have had in life.

Last year, a healthy population of Kings returned to the Gulkana, but the river was shut down as the greater Copper River Basin population was low. Meanwhile, my commercial fishing friends in Cordova did very well in targeting the King Salmon. Please pass #51 and help restore a way of life that is about to be lost.

Submitted by: Sean Nadeau

Community of Residence: Gakona

Comment:

Adoption of #14. Implement more sustainable fishing practices. More selective and low impact methods.



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

November 25, 2024

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The National Marine Fisheries Service is providing the enclosed information on three regulatory proposals (6, 8 and 13) to the Alaska Board of Fisheries for your consideration during the upcoming meeting in Anchorage, Alaska. These proposals could impact State of Alaska and Federal fisheries participants. Please contact Gretchen Harrington, Assistant Regional Administrator, if you have any questions concerning our letter at 907-586-7228, gretchen.harrington@noaa.gov.

Sincerely

A handwritten signature in blue ink, appearing to read "J. Kurland".

Jonathan M. Kurland
Regional Administrator



**Prince William Sound/Upper Copper and Upper Susitna Rivers Finfish and Shellfish
Interaction Between Federal and State of Alaska Fisheries Alaska Board of Fisheries
Meeting – December 10 –16, 2024
National Marine Fisheries Service (NMFS) Comments (Proposals 6, 8 and 13)**

Proposal 6: 5 AAC 28.265. Prince William Sound Rockfish Management Plan.

Potential Issues:

- *It would be difficult to enforce full retention in Federal waters for jig vessels that participate in both State and Federal waters in the same trip.*
- *Participants using jig gear could be confused when full retention is required if they participate in both State and Federal waters.*

Proposal 6 seeks to allow for rockfish release for jig and hand troll fisheries inside State waters of the Prince William Sound Management area. Current Federal regulations prohibit discarding rockfish from a catcher vessel that has a Federal fishing permit (FFP) when fishing for groundfish or individual fishing quota (IFQ) or Community Development Quota (CDQ) halibut using hook-and-line, jig, or pot gear in Federal waters of the Gulf of Alaska (GOA) and Bering Sea and Aleutian Islands (BSAI) (§ 679.7(a)(5)(i)). Should the Board adopt this proposal, it would be difficult to enforce the full retention requirements in Federal waters if a jig vessel participated both inside and outside State waters during the same trip. In this case, the vessel would have to retain all rockfish in Federal waters, but could discard rockfish in State waters. It would be difficult for enforcement officials to confirm that all rockfish were retained in Federal waters under these circumstances. This change, if implemented, may cause confusion for vessels participating in both State and Federal waters because they would be subject to different requirements for each area. Should the Board adopt this proposal outreach would be needed to ensure fishers are aware which set of regulations apply in State waters versus Federal waters.

Background on rockfish full retention:

Federal regulation became effective on March 23, 2020 (85 FR 9687, February 20, 2020) requiring full retention of rockfish (*Sebastes* and *Sebastolobus* species) in the GOA and BSAI by catcher vessels using jig, hook-and-line, or pot gear in the federal groundfish and Pacific halibut fisheries. This action improves identification of rockfish species catch by vessels using electronic monitoring, provides more precise estimates of rockfish catch, reduces waste and incentives to discard rockfish, reduces overall enforcement burden, and promotes more consistent management between State and Federal fisheries. When this Federal rule took effect, the State already had full retention requirements for all rockfish in some areas, including Prince William Sound. The Federal final rule was established to create similar regulations that were already in place in State waters. This provided consistency to vessel operators, ensuring they were no longer subject to two different sets of retention rules.

Proposal 8: 5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.**Potential Issues:**

- *Federal total allowable catch (TAC) is already reduced from the acceptable biological catch (ABC) to account for State guideline harvest level (GHL) fisheries. NMFS recommends basing GHL fisheries on ABCs rather than TACs in order to fully utilize available quota.*
- *NMFS would need notice of any increase/decrease in the State GHL by November 15 in order to correctly set the Gulf of Alaska (GOA) harvest specifications for the following calendar year.*

Proposal 8 seeks to increase the Prince William Sound GHL fishery from 25% of the Federal Eastern GOA TAC to 35% of the TAC with a step up and step down provision based on the previous year's performance with a maximum cap set at 50% of the TAC. The TAC is the amount of catch allocated for the Federal fishery and the North Pacific Fishery Management Council (Council) is responsible for recommending TACs that do not exceed the ABCs. The TACs must take into account Pacific cod State GHL fisheries by reducing the TAC down from the ABC by the amount of the GHL fishery. Because the Federal TAC is already adjusted to take into account the GHL fisheries, if the Prince William Sound Pacific cod GHL fishery is based on TAC, it would prevent some Pacific cod quota from being allocated to any fishery (State and Federal). In order to fully utilize the available quota, NMFS recommends that GHL percentages be based on the Federal ABC and not the TAC.

Each year in August, the Council and NMFS begin work to set groundfish harvest specifications for the upcoming and following calendar year. The Council's Scientific and Statistical Committee (SSC) sets final overfishing limits (OFLs) and ABCs and the Council sets final TACs at the December Council meeting each year. Any changes to the Prince William Sound Pacific cod State GHL percentage will require an update in the Federal harvest specification process to ensure Federal TAC plus State GHL does not exceed the Federal ABC as recommended by the SSC. Should the Board adopt this proposal, coordination between the Alaska Department of Fish and Game (ADF&G) and NMFS would be essential to ensure NMFS properly accounts for this change during the Federal harvest specification process.

NMFS would need to be informed no later than November 15 each year to ensure any step up or down provisions effective the following calendar year were known in time for the Federal harvest specification process. In order to accommodate the Federal process, there are other State GHL Pacific cod management plans with step up and down provisions which use November 15 as the date for determining if the GHL will be achieved before the end of the year. See 5 AAC 28.648(e)(1)(A)(iii) and 5 AAC 28.647(d)(C) for examples in both the Dutch Harbor Subdistrict Pacific cod and Aleutian Islands Subdistrict Pacific cod management plans. Similar regulatory language in the Prince William Sound Pacific Cod Management Plan would ensure the Federal harvest specifications were completed successfully and in a timely fashion for the following calendar year. If a new GHL amount will be in effect in 2025 NMFS would need to be notified as soon as possible in order to make the necessary changes in the 2025 harvest specifications. For more information on the Federal harvest specification process and recent utilization of Federal Eastern GOA Pacific cod TAC see the background section below.

Background on Federal Eastern Gulf of Alaska (GOA) Pacific cod management:

Federal Pacific cod OFLs and ABCs are recommended by the SSC and TACs are recommended by the Council and established by the Secretary of Commerce on an annual basis. In the GOA, the SSC recommends the OFL and ABC for Pacific cod for the entire GOA.

The ABC is apportioned to each of the GOA regulatory areas (Western, Central, and Eastern) based on the distribution of trawl survey biomass among each of the areas. The TACs are set based on the ABCs and are set to accommodate the State of Alaska's Pacific cod fisheries so that the ABC for Pacific cod is not exceeded. Currently there is one State fishery that establishes a GHL based on the Federal ABC in the Eastern GOA; Prince William Sound (25% of the ABC). Because the Council must ensure that total catch in the Eastern GOA does not exceed the ABC, the Council determines the Federal TAC by applying the State GHL to the Eastern GOA ABC, as set by the SSC, and designating the remainder of the ABC as the Federal TAC. After taking into account the state-waters GHL fishery, the TAC is set equal to or less than the remainder of the Pacific cod Federal ABC. The inshore sector is then allocated 90% of the TAC and the remaining 10% is allocated to the offshore sector. There are no seasonal apportionments in the Eastern GOA.

Because the Federal TACs are determined after the subtraction of the state-water GHL fishery from the ABC, this proposal, if adopted, would result in an overall decrease in the amount of TAC available in the Federal Eastern GOA Pacific cod fisheries. However, the Federal Pacific cod TAC has not been fully utilized in the Eastern GOA in the past nine years. Table 1 shows the ABC, TAC, Federal harvest, and the percent utilized (catch/TAC) in metric tons from 2015 to 2023.

Table 1. Federal Eastern GOA Pacific cod harvest compared to TAC from 2015-2023 in metric tons.

Year	ABC	TAC	Federal Catch	Percent Catch
2015	2,828	2,121	1,199	57%
2016	8,785	6,589	485	7%
2017	7,871	5,903	367	6%
2018	1,800	1,350	187	14%
2019	1,700	1,275	228	18%
2020	1,221	5,49	275	50%
2021	1,985	1,489	202	14%
2022	3,117	2,338	304	13%
2023	2,340	1,755	411	23%

Proposal 13: 5 AAC 28.267. Prince William Sound Pacific Cod Management Plan.**Potential Issues:**

- *Allowing 100% retention of skates could result in fishermen targeting skates and inadvertently create a directed fishery.*
- *Targeting longnose and big skates could increase bycatch of halibut, sablefish, important rockfish species, and other skate species.*
- *Targeting longnose and big skates could result in the federal TACs being reached and those species being prohibited from retention.*
- *Vessels that fish in both State and Federal waters during the same trip would be unable to keep 100% of skates even during the portion of the trip occurring in State waters. This could cause confusion for fishermen participating in both Federal and State waters during the same trip.*
- *Skates are slow growing with low fecundity and can spend several years to over a decade, depending on the species, in the juvenile stage. If immature skates are disproportionately exposed to fishing pressure, that could be an unsustainable practice with lasting effects on skate populations.*

Proposal 13 seeks to allow 100% retention of longnose and big skates during the Prince William Sound state-waters longline Pacific cod and halibut fisheries until 25% of the Eastern GOA Federal TAC has been reached. Catch of skates in both Federal and parallel waters are deducted from the Federal TAC. Should the Board approve this proposal it would incentivize vessels to “top off” on skates. “Topping off” is when a vessel targets a species not open to directed fishing to the maximum amount allowed instead of indirectly catching the species while in pursuit of another species. It is unclear if the intention of this proposal is to allow retention up to 100% of the Pacific cod or halibut on board, or 100% of all skates even if it surpasses the total amount of Pacific cod or halibut on board the vessel. In either case, it would create an opportunity for a vessel to target skates thus inadvertently creating a directed fishery for longnose and big skates. Furthermore, if “topping off” on skates while participating in a Pacific cod fishery did occur, then halibut bycatch would likely increase during that activity. Skates are often encountered while halibut fishing with longline gear and it is possible the two species share habitat. The halibut would be discarded unless there was an IFQ holder on board the vessel. Targeting skate species could also result in higher bycatch of other species such as sablefish, various rockfish species, and other skate species.

Each year in the GOA harvest specifications, NMFS establishes a directed fishing closure for longnose skate and big skate (e.g., 89 FR 15484, March 4, 2024). Despite a directed fishing closure, the five year average for percent utilized (total catch relative to the Federal Eastern GOA TAC) was 77 percent for longnose skate and 20 percent for big skate in 2024 (see Tables 2 and 3 below). This proposal states that the Federal skate TAC is historically only 50% harvested. Although this is true for big skates, it is not true for longnose skates. Four out of the last five years, the longnose skate harvest has surpassed 50% catch. In three of those years the TAC surpassed 75%, and in 2023 catch was 122% of the TAC. Under this proposal, if 100% retention of skates was allowed in State waters up to 25% of the Federal TAC, then it is possible that the TAC would have been exceeded for longnose skate in 2021 and 2022 as well. Big skate harvest has been below 50% of TAC.

Table 2. Federal Eastern GOA longnose skate harvest compared to TAC from 2019-2023 in metric tons.

Year	Eastern GOA Longnose Skate TAC	Total Catch	Percent Catch
2019	619	315	51%
2020	554	265	48%
2021	554	471	85%
2022	517	409	79%
2023	517	632	122%

Table 3. Federal Eastern GOA big skate harvest compared to TAC from 2019-2023 in metric tons.

Year	Eastern GOA Big Skate TAC	Total Catch	Percent Catch
2019	579	102	18%
2020	890	180	20%
2021	890	191	21%
2022	794	116	15%
2023	794	218	27%

Currently the Federal GOA harvest specifications specify separate TACs for longnose and big skates. It is unclear from this proposal whether the intent is to include 25% of the longnose skate TAC and 25% of the big skate TAC, or 25% of the combined TACs. If the intention is 25% of the combined TACs it could result in one skate species being disproportionately harvested compared to the other, causing a greater proportion of TAC taken for that species. When the Federal TAC is reached, NMFS prohibits retention of that species and requires the species to be treated as prohibited species in accordance with Federal regulations at § 679.21(a)(2). Should this proposal be adopted it could result in the Federal TAC being reached and result in prohibited retention of longnose and big skates before the end of the calendar year. Skates that are harvested in small amounts incidentally while pursuing other species would have to be discarded instead of utilized.

A vessel that participates in both State and Federal waters in the same fishing trip would be restricted to the lowest maximum retainable amount (MRA) for the duration of the fishing trip (§ 679.20(e)(3)(i)) by Federal regulation. If a vessel participates in both State and Federal waters in the same trip, the vessel would only be allowed to keep up to 5% of each skate species, even in State waters. This could cause confusion about the amount of skates a vessel is allowed to retain and would require outreach to industry.

The 2019 stock assessment of the skate stock complex in the GOA states that skates are a slow growing species with low fecundity and population stability likely depends on high survival rates of animals to maturity. Although data is sparse for Alaskan skate species, some studies in other areas have shown that skate species with the largest body sizes (such as longnose skates and big

skates) are the least resilient to high fishing mortality rates. This may be due to fishing pressure being applied to skates while they are still in the long juvenile stage and have not yet reached maturity. During the State GHL fishery in Prince William Sound for skates in 2009 and 2010 it was reported that big skate catches comprised predominately of immature females and longnose skate catches comprised of mature males and females. If the majority of skates removed from the stock are immature and have not yet reached an age to contribute offspring, the skate population could decline as a whole. As a result, precautionary management of these species has been recommended.

Data regarding skates in the GOA is extremely limited and more research is needed on the effects of fishing on skate populations. According to the stock assessment, adult skates are highly mobile and likely cross between areas. Eggs and juveniles use different habitat than adults and little is known about the nursery areas used by skates in the GOA. If implementation of this proposal results in “topping off” behavior by targeting skates to the maximum amount, it may disrupt these nursery areas or other important skate habitat. Due to these factors and the possibility of targeting skates through “topping off” behavior resulting in disproportionately harvesting juvenile skates, 100% retention of skates in Prince William Sound could impact overall skate populations in the entire GOA.

Background on federal GOA skates management:

The skate complex in the GOA has been broken out into three categories for management purposes since 2005: longnose skates, big skates, and other skates. OFLs, ABCs, and TACs for longnose skates, big skates, and other skates in the GOA are recommended by the Council and established by the Secretary of Commerce on a yearly basis. The SSC recommends the OFLs and ABCs for longnose skates, big skates, and other skates for the entire GOA. The ABCs are apportioned to each of the GOA regulatory areas (Western, Central, and Eastern) for longnose skates and big skates based on the distribution of trawl survey biomass among each of the areas. Other skates are not apportioned by GOA regulatory areas and are managed at the GOA-wide level. The Council then recommends the TACs for each of the three skate categories at or below the ABCs. In most years the TACs are set equal to the ABCs. Prince William Sound is in federal reporting area 649, which is part of the Eastern GOA.

There is currently no directed fishery for any skate species in the GOA federal fisheries. The MRA of skates prior to 2016 was 20%. However, fishermen were targeting skates while participating in other directed fisheries early in the year which increased the likelihood that skates catch would be reached and exceed the TAC/ABC and would require a skates prohibited species closure. A prohibited species closure requires any skates encountered to be discarded. Beginning in January 2016 the MRA was reduced to 5% to decrease the incentive for fishermen to target skates while participating in other directed fisheries and to more accurately reflect the encounter rate of skates during fishing.



To: Alaska Board of Fish

Re: Proposal comments for PWS and Upper Copper/Upper Susitna Rivers

Introduction

Salmon are crucial to the ecosystem and hold significant cultural and spiritual importance for Indigenous communities. Protecting salmon habitats ensures these vital connections continue. The Declaration of the International Indigenous Salmon Peoples Gathering emphasizes the interconnectedness of Indigenous Peoples with salmon and their habitats. It highlights the importance of Indigenous stewardship, the impacts of climate change, and the need for meaningful involvement of Indigenous communities in management decisions.

We commend the Board of Fish for acknowledging the key role of Traditional Knowledge and holding space for Traditional Knowledge holders. We also urge ADF&G to adhere to their government-to-government policy on formal Tribal Consultation as a way to incorporate Traditional Knowledge. Additionally, one of the best ways to incorporate Traditional Knowledge is to have Traditional Knowledge holders represented on the Board of Game in decision-making positions.

Integrating Tribal interests into the Board of Fish process is essential for creating a more informed, sustainable, and equitable future. Tribes bring invaluable, deep-rooted knowledge and a long-term commitment to stewardship that should be recognized and respected. For millennia, Tribes have managed these lands and waters, developing innovative conservation practices. Including Tribal perspectives in fisheries management not only ensures better management but also addresses the unique needs and challenges faced by all Alaskans.

Thank you for considering these comments.

Proposal 16

5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

I am writing on behalf of Native Movement to express our support for Proposal 16, which seeks to close the state-managed Prince William Sound (PWS) pollock trawl fishery.

Trawling is an indiscriminate and wasteful fishing method that results in significant bycatch, including Chinook salmon, shortraker rockfish, and rougheye rockfish. Chinook salmon populations are struggling across large regions of the state, leading ADF&G to close or heavily restrict sport and subsistence fishing. Shortraker and rougheye rockfish, which are non-pelagic, are also caught as bycatch in the PWS pelagic trawl fishery, indicating bottom contact.

The National Marine Fisheries Service estimates that small pelagic trawl vessels, like those used in PWS, make bottom contact up to 60% of the time. This bycatch demonstrates an unsustainable fishery that damages the seafloor. The PWS trawl fishery relies on skipper and processor fish tickets for bycatch data, but without adequate third-party observer coverage or electronic monitoring, bycatch rates cannot be accurately reported. It is in the best interest of the State of Alaska to protect fisheries and marine environments by closing the state managed PWS trawl fishery to prevent further devastation.

Closing the trawl fishery in PWS would have the greatest impact on protecting and conserving important fish and marine habitats from the detrimental effects of trawl fishing and seabed dragging.

Proposal 14

5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

We also support Proposal 14, which recommends regulatory amendments allowing ADF&G staff to manage the PWS pollock trawl fishery for the conservation of bycatch species and vital habitats. This proposal would enable ADF&G to close the fishery if pelagic trawl gear makes bottom contact or if trawlers catch Chinook salmon.

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, bycatch limits should be set to preserve the species caught, rather than being based on the amount of pollock harvested. This proposal would allow ADF&G to set bycatch limits focused on the conservation of species of concern, such as Chinook salmon, and the avoidance or minimization of benthic species like rougheye and shortraker rockfish.

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 require third-party onboard observers and electronic monitoring (EM) to accurately verify all bycatch amounts. Currently, ADF&G relies on skipper and processor data to report bycatch limits, which is not an effective monitoring method. Observer data is necessary to verify recorded bycatch.

EM and observers would provide more transparency and enforcement of compliance in the fishery, as well as more accurate accounting and data of bycatch harvest. This proposal should be passed alongside Proposals 14 or 16 to limit bycatch and increase oversight.

Reasoning for supporting Proposals 14-17

In a 2023 report, the National Marine Fisheries Service estimated that pelagic trawl gear on catcher vessels in the Gulf of Alaska contacts the seabed 40% of the time. Fish harvested in the PWS pollock trawl fishery are delivered to and processed in Kodiak.

In June 2024, ADF&G closed the Upper Copper River and its tributaries, including the Gulkana, Klutina, Tazlina, and Tonsina Rivers, for both sport and subsistence fishing of Chinook salmon. It was evident that the Copper River would not meet the lower bounds of the management escapement goals (21,000-31,000). On June 23rd, the Chinook salmon passage from the Gulkana River counting tower was less than 55% of the historical average. By the end of the run in August 2024, only 4,065 Chinook were counted passing the Gulkana River sonar station, compared to 4,932 in 2023, 4,902 in 2022, 3,414 in 2021, and 2,262 in 2020.

On average, 902 shortraker rockfish, 133 rougheye rockfish, 389 Chinook salmon, 76,000 pounds of squid, 2,214 pounds of shark, and 10,499 pounds of other species are caught annually. Other bottom-dwelling species brought in by trawlers include halibut, black cod, lumpsuckers, skates, sole, flounder, octopus, prowfish, and other rockfish species.

Proposal 51

5 AAC 24.360. Copper River District Salmon Management Plan

We support Proposal 51, which aims to manage the timing of commercial salmon harvests in the Copper River District to protect early run salmon stocks. This proposal is

essential for ensuring the sustainability of these stocks and supporting the subsistence needs of local Indigenous communities. Early-run Copper River salmon are particularly vulnerable to overexploitation. Managing the timing of commercial harvests will help protect these stocks and ensure their sustainability for future generations. Early-run salmon are vital for maintaining the genetic diversity and resilience of salmon populations. They often spawn in headwater streams, which are crucial for the overall health of the salmon ecosystem. Ensuring these salmon reach their spawning grounds supports the long-term viability of the species. The timing and strength of early salmon runs are indicators of river ecosystem health. Strong early runs signify a healthy environment, while weak runs can indicate ecological imbalances or stressors.

Indigenous communities, especially those in headwater areas, rely heavily on early-run salmon for subsistence. Ensuring that more early-run salmon reach these communities is vital for their food security and cultural practices. This proposal aligns with the principles of the Policy for the Management of Mixed Stock Salmon Fisheries and the Policy for the Management of Sustainable Salmon Fisheries, which prioritize the conservation of wild salmon stocks and the maintenance of genetic diversity. By focusing on the timing rather than the allocation of harvests, the proposal seeks to balance the needs of commercial, sport, and subsistence fishers, promoting a fair and equitable approach to resource management. The proposed sonar-based management approach is practical and cost-effective, allowing for immediate action. It ensures that commercial fishing does not disproportionately impact early-run salmon stocks.

Protecting these salmon runs is essential for maintaining the health of both the environment and the cultural heritage of Indigenous peoples in Alaska. By adopting this proposal, we can ensure the long-term sustainability of Copper River salmon and uphold the cultural and nutritional needs of local communities.

Proposal 52

5 AAC 24.360. Copper River District Salmon Management Plan

We support Proposal 52, which aims to reduce commercial salmon fishing opportunities in the Copper River District by adjusting the timing of fishing openers. This proposal is crucial for protecting the genetic diversity of salmon in the Copper River Watershed. Traditional Ecological Knowledge from Tribal citizens and residents, supported by scientific studies, indicates that the run timing of Copper River salmon has been delayed by about two weeks in recent years. This delay makes early-returning salmon, which are crucial for maintaining genetic

diversity, more susceptible to higher catch rates. By allowing only two 12-hour commercial fishing openers during the week of May 15th and then delaying further openers by two weeks or until a daily management objective for fish passage is met at the Miles Lake Sonar, will be a vital step towards protecting the genetic diversity of Copper River salmon and ensuring the long-term sustainability of this vital resource for all user groups.

Proposal 78

We support Proposal 78, which seeks to reduce the permitted egg take levels of pink and chum salmon at Prince William Sound hatcheries by 25%. This reduction is crucial for addressing the significant evidence that the ocean's carrying capacity is being strained by the proliferation of hatchery releases from both Alaska and Asia. The decline of Chinook salmon stocks across Alaska, including the critical situation on the Yukon River, underscores the urgent need for this measure. By reducing hatchery egg takes, we can help mitigate one of the top factors contributing to salmon decline, alongside climate change, bycatch, and disease. Importantly, this is one of the contributing factors affecting salmon survival that we can change. This proposal represents a necessary step towards ensuring the sustainability of wild salmon populations and the health of our marine ecosystems. The proposed five-year evaluation period will provide valuable data to assess the impact of this reduction and guide future management decisions. It is imperative that we act now to protect our wild salmon stocks for future generations.

We would also like to take this opportunity to honor the memory of Katie John, a revered Alaskan elder from this region whose unwavering dedication to her family and culture, has left an indelible mark on our communities and future generations. Katie John was more than a leader; she was a beacon of resilience, wisdom, and cultural preservation.

Born in 1915 in the village of Slana, Katie John grew up immersed in the traditions and values of her Ahtna Athabascan heritage. Her life was a testament to the strength and spirit of Indigenous peoples, and her legacy is one of profound significance.

Katie John's journey as an advocate began with a simple yet powerful belief: that the right to fish and sustain one's family is fundamental to the survival of Indigenous people. Her fight for subsistence fishing rights was not just about securing food; it was about preserving a way of life that had been passed down through generations.

In the face of legal and political challenges, Katie John stood firm. Her landmark legal battle, known as the "Katie John case," sought to ensure that Indigenous peoples could continue to fish in their traditional and ancestral waters. Her perseverance led to a historic victory in 1994, when the federal court recognized the subsistence fishing rights of Alaska Natives on federal lands and waters. This ruling was a monumental step forward in the protection of Indigenous rights and the acknowledgment of our deep connection to the land and waters.

Katie John's legacy extends beyond her legal triumphs. She was a teacher, a storyteller, and a keeper of traditions. She shared her knowledge with younger generations, instilling in them the importance of respecting and protecting our lands and waters. Her teachings continue to inspire us to uphold our cultural practices and to fight for the rights that sustain our communities.

As we remember Katie John, we celebrate her life and the enduring impact of her work. She showed us that one person's determination can lead to transformative change. Her spirit lives on in the rivers and streams where we fish, in the stories we tell, and in the hearts of those who continue her fight for justice and cultural preservation.

Katie John was a guardian of our heritage, a champion of our rights, and a beloved elder whose legacy will forever guide us. May we honor her memory by continuing to protect and cherish the traditions and values that define who we are. Her legacy is a powerful reminder of the importance of standing up for what is right and preserving the traditions that connect us to our ancestors, as well as the lands and waters that sustain us.



Scan the QR code to visit our new landing page:



The landing page celebrates the vital role of Indigenous People as stewards of our salmon relatives. It brings to light the urgent salmon crisis, identifying the main challenges and meaningful solutions for revitalizing Alaska's salmon fisheries. It underscores the power of collective action in advocacy, education, and stewardship, inspiring us all to work together to ensure a future where wild salmon flourish in our rivers.

Proposal 14

What it does: 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) 1) 2) A direct Alaska pollock Pelagic trawl fishery in PWS is prohibited unless; No part or attachment to the Pelagic trawl gear makes contact with the seafloor habitat. There is no bycatch of Chinook salmon in the PWS Pollock Pelagic trawl fishery.

Native Village of Chitina Position: Support. Waste of Chinook salmon through trawling bycatch is unacceptable. It depletes our counts which leads to starvation and ruins the sea floor destroying important habitat disrupting the marine ecosystem, which also will cause starvation.

Proposal 15

What it does: Modify bycatch limits in the Prince William Sound pelagic trawl fishery, as follows: During a directed walleye pollock pelagic trawl fishery, the total bycatch weight of all species combined may not exceed an amount set by ADFG of xxx lbs [FIVE PERCENT] regardless of the total round weight of the walleye pollock harvested.

Native Village of Chitina Position: Oppose. Close the Prince William Sound pelagic trawl fishery. Add a new section. PWS Pelagic Trawl Fishery is prohibited unless; No part or attachment to the Pelagic trawl gear makes contact with the seafloor habitat. There is no bycatch of Chinook salmon in the PWS Pollock Pelagic trawl fishery.

Proposal 16

What it does: Close the Prince William Sound pelagic trawl fishery, as follows: Closure of the Prince William Sound Walleye Pollock Pelagic Trawl Fishery to preserve PWS.

Native Village of Chitina Position: Support. Close the Prince William Sound pelagic trawl fishery to bring up our numbers of chinook salmon and protect the salmon runs ecosystem.

Proposal 17

What it does: Establish observer requirements in the Prince William Sound pelagic trawl fishery, as follows: (h) The commissioner shall [MAY] require 100% onboard electronic observation and 50% physical onboard observers on a vessel during fishing operations.

Native Village of Chitina Position: Support. The commissioner shall require 100% onboard electronic observations and 100% physical onboard observers on a vessel during fishing operations to get real data until trawling is closed.

Proposal 45

What it does: This would allow salmon to be taken for subsistence in the inside closure area described in 5 AAC 24.350(1)(B) unless all other Copper River king salmon fisheries have been restricted first.

Native Village of Chitina Position: Oppose. Need to conserve for all.

Proposal 46

What it does: Require Copper River District subsistence fishery harvest reporting within seven days of harvest.

Native Village of Chitina Position: Support. This will help ADF&G better monitor fish counts and their escapement goals. ADF&G either can create a method and follow it or subcontract this out who can get the work done providing better reports.

Proposal 47

What it does: Require in-season harvest reporting by Glennallen Subdistrict subsistence and Chitina Subdistrict personal use fisheries permit holders within 5 days of their fishing activity.

Native Village of Chitina Position: Support. In-season reporting would support making the counts and escapements goals, depleting fishing closures. There is great technology today that can help users report by using hotspots on electronic devices, if needed. Again, ADF&G can contract this out to put user reports in data.

Proposal 48

What it does: Allow guided fishing from a boat in the Copper River Glennallen Subdistrict subsistence salmon fishery.

Native Village of Chitina Position: Oppose. This would provide less access to the fishery for those who do not have access to a guided boat due to financial purposes, or who cannot go on a boat or operate a boat for physical and/or personal reasons on the Copper River. This should not allow access for those with physical limitations, as this is a life-threatening risk to the physical limited person.

Proposal 49

What it does: Prohibit commercial operators from transporting state subsistence permit holders engaged in subsistence fishing activities.

Native Village of Chitina Position: Support. Subsistence is for non-commercial users.

Proposal 50

What it does: Prohibit the use of any electronics that may aid in locating fish, depth, or paths of travel, such as fish finders, depth finders, and chart-plotters, while fishing from a boat in the Glennallen and Chitina Subdistricts.

Native Village of Chitina Position: Support. The purpose of permit holders using this technology is to get higher harvest rates. Prohibiting these devices would increase boat safety rather than staring at devices on a boat.

Proposal 58

What it does: Provide emergency order authority for the commissioner to increase the king salmon annual limit in the Copper River Chitina Subdistrict (CSD) personal use dip net salmon fishery when escapement is projected to exceed the upper bound of the spawning escapement goal.

Native Village of Chitina Position: Oppose. ADF&G needs better monitoring to be consistent in counts and escapement goals before making any further decisions. Again, contract it out if needed. No one can make assumptions for additional harvest opportunities.

Proposal 59

What it does: Provide emergency order authority for the commissioner to increase the sockeye salmon annual limit in the Copper River Chitina Subdistrict (CSD) personal use dip net salmon fishery when sockeye escapement is projected to exceed the upper bound of the spawning escapement goal.

Native Village of Chitina Position: Oppose. ADF&G needs better monitoring to be consistent in counts and escapement goals before making any further decisions. Again, contract it out if needed. No one can make assumptions for additional harvest opportunities.

Proposal 60

What it does: Reduce the total annual limit in the Chitina Subdistrict personal use salmon dip net fishery. The limit for head of household would be reduced from 25 to 20 fish, and the limit for each additional household member would be reduced from 10 to 5 fish.

Native Village of Chitina Position: Support. Need conservation for all districts along the river before making a decision for one district.

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10,000 years in our Traditional Homeland, Prince William Sound, the Copper River Delta, and the Gulf of Alaska

Native Village of Eyak
 On-Time Public Comment
 Prince William Sound/Copper River/Upper Susitna Finfish/Shellfish
 Cordova, AK
 December 10-16, 2024

The following positions were unanimously approved by the Native Village of Eyak Tribal Council based upon recommendations from its Department of the Environment and Natural Resources, and the Native Village of Eyak Natural Resources Advisory Council.

The following proposals are SUPPORTED: 3, 9, 10, 14, 15*, 16*, 17*, 26, 29, 46, 47, 49, 62*, 67, 80, 81, 84, 87, 88.

The following proposals are SUPPORTED WITH MODIFICATION: 2*, 44*

The following proposals are OPPOSED: 48*, 51*, 52, 53, 54*, 56*, 57, 70, 73, 74, 78*, 86,

We are NEUTRAL on all other proposals.

Proposals marked with an asterisk (*) are commented upon below:

Support:

15: One of the main points at which the Trawl fisheries departs from sustainability is that bycatch is permitted as a proportion of overall target species available for harvest. Thus, when large amounts of pollock are available for harvest, a proportionately large amount of bycatch is permitted. This makes no sense biologically as the vulnerability of each bycatch species is unique, and not based upon the number of pollock. We support establishing specific limits for each bycatch species based upon that species' vulnerability to bycatch and stock status.

16: The midwater-trawl fishery is fraught with unintended consequences that severely impact other commercial fisheries, as well as subsistence, personal-use, and sport fisheries statewide. As other fisheries become more focused on target species and efficiency, the trawl fleet continues to damage bottom habitat and harvest

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indiscriminately. We support the closure of this fishery until a management plan can be passed that meaningfully limits bycatch and eliminates any contact with the bottom.

17: If the trawl fishery is allowed to commence it must be with full observer coverage in order to increase the accuracy of bycatch reporting.

62: We support this proposal as we believe it is important that the burden of conservation be shared.

Support with Modification:

2: We support this proposal with the modification that the area being reopened be limited to a maximum vessel size of 42'.

44: We support Proposal 44 with the modification that extra gear only be allowed during subsistence-only openers. If this were allowed during mixed commercial/subsistence openers it would cause substantial issues for law enforcement.

Oppose:

48: We are opposed to the commercialization of subsistence harvests.

51: Proposal 51 is allocative due to an unequal reduction in harvest opportunity across all user groups targeting early-run Copper River Salmon, and so is outside the authority of the Board of Fish to implement as the fishery is fully allocated. This proposal recommends a shift to stock-specific management, which is a laudable goal that we support, however this shift is premature, lacking both stock-specific management plans and stock-specific escapement monitoring. Further Proposal 51 provides little support that the proposed changes would achieve the desired results, when the claimed stock diversity issues have not been properly documented. Rather, these upriver stocks should have escapement monitoring programs initiated in order to determine whether the reduced harvests correlate with lower salmon abundance or if there are other explanations, such as users switching from state to federal subsistence fisheries that provide opportunity in additional areas (e.g. Chitina subdistrict) and/or gear types (from fishwheel to dipnet).

Proposal 51 would cause unnecessary hardship for commercial permit holders as it would substantially reduce their opportunity to harvest early season salmon, which are of vastly higher value than fish caught even a few weeks later. This would negatively impact most

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Tribal Member households. Moreover, the early fishery is already limited in its opportunity to harvest and this management strategy has proven successful.

Proposal 51 takes adaptive management tools away from our managers who must already manage early season runs conservatively. If there were compelling evidence that this strategy would result in the restoration of declining stocks all would support it, but not even having properly documented the need, this is a solution looking for a problem.

Stock-specific management must be included in the future of Copper River Salmon management. But any stocks being managed discretely must also be monitored discreetly or we will have no data to determine whether our management strategies are successful. Until these stocks are defined and monitored, the need for this shift validated, and a management plan (that includes escapement monitoring) put in place, this management strategy is irresponsible.

54: While we support fishing opportunity in inside waters, we feel that Proposal 54 would cause managers to close the entire fishery when outside opportunity could be provided, resulting in less overall fishing opportunity.

56: We are opposed to stacking Area E Drift Gillnet permits. We feel this strategy would most benefit the wealthiest permit holders by allowing them the opportunity to fish more gear, and is a form of fleet downsizing, which we oppose.

78: Proposal 78 has been rejected consistently. In 2021 the Board of Fish found that it did not have the authority to implement Proposal 78, a decision with which we concur, and hope is re-affirmed.

If the claims made in Proposal 78 are legitimate then the agreements cited must be documented, but no documentation has ever been provided.

The Regional Planning Team (RPT) process for establishing smolt release goals is open and participatory, allowing for public input, but this reduction is never brought forward there, where it would be appropriate to do so.

There is no documented need to reduce smolt release goals per Proposal 78, nor to disrupt the RPT process in favor of a political selection.

86: While we support the conservation of Coho salmon on the Copper River Delta and sound harvest practices on Ibeck Creek, we believe that this proposal would have no

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conservation benefit for Ibeck Coho salmon stocks, while causing increased fishing pressure on more vulnerable stocks. Currently sport fishing is prohibited 3 miles north of the Copper River Highway to protect spawning habitat. However widespread spawning begins about 5 miles north of the road and farther. Thus, we feel that prohibiting sport fishing for an additional 1.5 miles, in an area where there is little to no spawning occurring, would displace fishing pressure to smaller systems across the delta, where the Copper River Highway bisects Coho salmon spawning habitat providing easy access to harvest actively spawning fish. This tradeoff is simply not worthwhile, as the smaller, potentially more discreet stocks may be more vulnerable than the Ibeck stocks, whose spawning beds are already protected.

PWS BOF Cordova, Dec. 2024

Support for Proposals 56 and 57

When dual permits were first an option in Bristol Bay, dock prices and harvests were poor. In the twenty years since, there has been a wide range of dock price and harvest combinations. Throughout that time, the dual permit feature has remained popular in the Bay. The percentage of “D” boats in their fleet fluctuates from year to year. From 2016 to 2023, about a third of the active permits were used as “D” cards with a low in that period of 22% in 2020 and a high of 46% in 2022 (Table 10 from 2016-2023 Bristol Bay Annual Management Reports).

With dual permits and permit stacking as options in the PWS driftnet fishery, it is likely that some or all of the inactive permits would be recruited back into the fishery, and that there would still be a significant fleet consolidation, resulting in fewer boats on the grounds and less gear in the water. With these tools available, fishermen would have more latitude in how they chose to structure and optimize their business, strengthening the fishery’s economic viability.

I whole heartedly believe that proposals 56 and 57 will help all of the PWS driftnet fleet. Let’s take this opportunity to adopt dual permits and permit stacking for PWS driftnetters. Thanks for your time and consideration.

Brian Nelson

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 Homer, Alaska, and I am the captain of a purse seiner. The Alaska salmon hatcheries provided a stable supply of pink and chum salmon for harvest, allowing me to transition from a long-term deckhand to captain of my own vessel. The reduction in egg take would make it almost impossible, in the current market, to continue as captain of my own vessel.

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,

Jakob Nelson

[REDACTED]

Homer, 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 from Homer, Alaska, and I hold a Prince William Sound seine fisheries permit, where I seine during the summer. Alaska's salmon hatcheries support a wide range of commercial and sport fishing and are a vital part of the state's economy. If Prop 78 were to pass, it would lead to a decrease in Alaska's salmon, which would directly impact me and my family, as we make our living off the salmon in Alaska.

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,

Luke Nelson

[REDACTED]

Homer, Alaska

Members of the Board of Fisheries,

I would like to submit comments regarding proposals 73-74, 75-77 and 78

I support proposals 73-74, which aim to simplify the permit stacking regulatory change made in 2021. The goal was to reduce the number of vessels participating in the fishery, and adopting these proposals would help achieve that goal. It reduces the potential risk to an individual trying to participate in permit stacking.

I strongly oppose allocative proposals 75-77. The current allocation policy in Prince William Sound is complex, but it is working. The proposals cherry-pick data to paint the drift fleet as being disadvantaged, however, the seine fleet is currently behind by \$120 million from the implementation of the allocation policy (COAR Report). The proposed changes would further disadvantage the seine fleet going forward. Taking action on these proposals would substantially disrupt the industry. Given the uncertainty in market conditions and fish returns we are facing the fleet needs stability in our fisheries.

I strongly oppose proposal 78 seeking to limit permitted hatchery egg take goals. Foremost the BOF does not have authority to regulate hatchery operations. Permitted egg take is firmly under the purview of ADFG to regulate hatchery operations. Furthermore, this proposal is based on supposition, theory, and opinion. It has no basis in scientific fact. Reducing the permitted egg take by 25% would have extreme consequences on area E fisheries.

Thomas Nelson
Homer, 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 seiner in Prince William Sound. With the market instabilities affecting herring so much the last decade the salmon returns are the main source of income for my business and my family's business. The hatcheries production in Prince William Sound are vital to the stability and success of the Fishing fleets there, which my family and I participate in. We rely on them to make it through the winters to the next season. I've been involved in the fishery for 15 years and have witnessed firsthand the vital importance of these hatchery salmon to me and my family. I can't see a possible and successful future in Prince William Sound salmon fisheries without hatchery salmon.

The reduction of the hatchery's eggs and returning fish would destabilize and undermine the sustainability and economics of the fisheries. The devastating effect it will have on me and my family, and the other fisherman in Prince William Sound cannot be overlooked.

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,

Zachary Nelson

A solid black rectangular box used to redact the signature of Zachary Nelson.

Homer, 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 fisherman, owner and operator of a drift gillnet for 15 years and seiner for 10 years. I am a subsistence user and have been a sports fishing outfitter for four years. Without hatcheries I wouldn't have the life that I'm fortunate to live. Without the bountiful resources they provide, there would be no future in commercial fishing and the town of Cordova would not be thriving like it is today.

There is a perfect case study for this impact already... in 2020 PWSAC hatcheries only achieved 70% of its pink salmon egg take. The offspring of that run returned in 2022 and it was so weak that there was no excess fish available after cost recovery and brood stock, ensuring economic failure for every fisherman relying on hatcheries. This proposal would ensure the death of hatcheries, which is the proposal's architect's intention.

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,

Jon Nichols



Cordova, Alaska

Submitted by: Dan Norman

Community of Residence: Kenai

Comment:

I support proposal 16 to close the trawl fishery in PWS.

The bycatch is out of control. In particular the bycatch of chinook salmon when our state has 14 listed stocks of concern.

Submitted by: Melissa Norris

Community of Residence: Eagle River

Comment:

I am in support of proposals 14, 15, 16 and 17. I feel very strongly against the trawl fishing style of commercial fishing, both bottom trawl and midwater trawl. To be clear, I would like to see all trawling banned near Alaska, but the PWS state run fishery can be the example leader. It will take the strength of all of us to start to reverse the damage that is being done to the environment and certain fish stocks.



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

November, 25, 2024

State of Alaska
Board of Fisheries

RE: OPPOSITION to Proposal 78

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

North Pacific Fisheries Association (NPFA) represents more than 60 independent commercial fishermen, their families, and crewmembers who harvest halibut, salmon, black cod, pacific cod, crab and herring. Based in Homer, our members fish throughout the waters of Alaska -- from Dixon Entrance to St. Mathews Island. Most of our members participate in state salmon fisheries either as fishermen, or tendering for processors, a good number of which also rely on strong hatchery programs.

NPFA OPPOSES Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound (PWS).

This proposal and its arbitrary (in contrast to the hatchery programs purposeful process in cooperation with the Department of Fish & Game) limitation of egg takes in PWS would severely undermine the economic benefits and sustainability that hatcheries provide Alaskan coastal communities. Alaska's hatchery programs contribute significantly to our state through jobs, labor income, taxes and significant economic output in the region and statewide. Reducing hatchery production by 25% would have dire economic consequences for communities such as Valdez, Seward and Cordova, which rely on the delivery of hatchery-produced salmon to support their economies. This 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 recreational lodges in the region. This proposal would further reduce hatchery production at a time when salmon-dependent communities need it the most.

For 50 years, Alaska's hatcheries have been an important part of sustainable fisheries management. They contribute to the livelihoods of thousands of Alaskans and create a stable source of salmon for all user groups. We have been encouraged by the Board of Fisheries' consistent decisions to reject anti-hatchery proposals and the Department of Fish & Game's continued oversight and collaboration in ensuring Alaska's salmon fisheries, which includes hatchery-origin salmon, remain both Marine Stewardship Council (MSC) and RFM (Responsible Fishery Management) certified.

We ask that the Board of Fisheries **reject Proposal 78**.

Respectfully,

Malcolm Milne
President, NPFA



NORTHERN SOUTHEAST REGIONAL AQUACULTURE ASSOCIATION, INC.
 1308 Sawmill Creek Road
 Sitka, Alaska 99835
 Office: (907) 747-6850 fax: (907) 747-1470

November 26, 2024

Alaska Dept. of Fish & Game
 Alaska Board of Fisheries
 PO Box 115526
 1255 W. 8th Street
 Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: **Opposition to Proposal 78 and 156**

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

Thank you for the opportunity to comment on salmon enhancement related proposals submitted to the Alaska Board of Fisheries for the 2024 Prince William Sound meeting.

I am the General Manager of Northern Southeast Regional Aquaculture Association, better known as NSRAA. We are the regional aquaculture association for the northern portion of southeast Alaska and operate the areas salmon enhancement hatcheries and projects. My comments represent our 25-member board, and the fishermen they represent, made up primarily of commercial salmon fishermen, with additional representation on our board by Sport, Subsistence, Processor, Municipal, Tribal Organizations, Conservation and Interested persons from our region. Our board has broad representation from our region and at our fall November 5th, 2024, meeting, our board passed a unanimous resolution, with no abstentions, **opposing** proposal **78** and **156**.

NSRAA strongly encourages the BOF to take no action on proposal 78. Proposal 78 has been submitted to the BOF with similar language a total of 10 times since 2005, in regions from Southeast to Prince William Sound, to Lower Cook Inlet to Kodiak. Half of these proposals sought a significant reduction of hatchery production by 50% or greater. For nearly two decades these proposals have not been acted upon by the Board of Fish and NSRAA encourages the board to take no action on proposal 78. The current proposal before you is the most recent submission, which take up tremendous time by ADFG and BOF staff, hatchery operators, processors, commercial salmon fishermen, and yourselves, the Alaska Board of Fisheries members.

Summary of BOF proposals submitted by the Fairbanks AC(FAC) or individual member of the FAC.

Year	Proposal #	Mtg/Region	Submitted By	Proposal Summary
2005	38	Prince William Sound	FAC Member	Reduce chum production 50% of 2003 level
2006	155	Southeast	FAC Member	Reduce chum production 50% of 2003 level
2008	81	Prince William Sound	FAC	Reduce chum production to 24% of 2000 levels
2011	115	Prince William Sound	FAC	Reduce chum production to 24% of 2000 levels
2018	ACR2	BOF Work Session	FAC Member	Cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000
2021	54	Prince William Sound	FAC Member	Reduce hatchery production to 24% of 2000 levels.
2023	43	Lower Cook Inlet	FAC	Reduce hatchery production to 25% of 2000 levels.
2023	59	Kodiak	FAC	Reduce hatchery production to 25% of 2000 levels.
2024	78	Prince William Sound	FAC Member	Reduce hatchery pink and chum production by 25%
2024	56	Southeast	FAC Member	Reduce hatchery pink and chum production by 25%

Proposal 78 should not be considered for action for the following reasons.

- **Board of Fish Lacks Authority**

The Board of Fish does not have authority over hatchery production permitting as that statute is within the purview of the department of ADFG and is summarized in the department of law memo on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production (1997, page 12). ADFG referenced this information in department staff comments for the 2024 Prince William Sound meeting (RC2, page 200).

Given (1) the detailed statutory scheme granting specific authority to the department over nearly every aspect of the permitting and operation of nonprofit hatcheries, (2) the more general statutory authority of the Board over the harvest of fishery resources, and (3) by contrast, the limitations imposed upon the specific statutory authority of the Board over hatchery permits by the amendment to AS 16.10.440(b) in 1979, we conclude the following. Though the Board may effectively amend hatchery permits by regulation in a manner that affects hatchery fish production, we do not believe the Board may either (1) adopt regulations that effectively veto or override a fundamental department policy decision regarding whether to authorize the operation of a particular hatchery or (2) adopt regulations preventing the department from exercising its authority to permit a hatchery operation. We believe that Board actions falling into either of these two categories would risk being viewed by a court as constructing an impermissible impediment to the department's role as the primary government agency responsible for the regulation of hatcheries. In particular, such actions would risk being deemed incompatible with the limitations imposed by the 1979 amendment to AS 16.05.440(b).

- Incorrect Regulation Cited

The regulation cited in proposal 78 seeks to reduce hatchery pink and chum through 5AAC 24.370, the Prince William Sound Management and Salmon Enhancement Allocation Plan. This plan does not permit nor control in anyway the production numbers of Private Nonprofit Hatchery production in the state. The purpose of this plan was to allocate the production from those facilities between gear groups. Proposal 78 does not seek to modify the allocation of those resources, only to reduce them entirely by 25%.

Section 5 AAC 24.370 - Prince William Sound Management and Salmon Enhancement Allocation Plan

(a) The purpose of the management and allocation plan contained in this section is to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial fisheries, and to reduce conflicts between these user groups. It is the intent of the Board of Fisheries (board) to allocate enhanced salmon stocks in the Prince William Sound Area to maintain the long-term historic balance between competing commercial users that has existed since statehood, while acknowledging developments in the fisheries that have occurred since this plan went into effect in 1991.

- Arbitrary Reduction

Proposal 78 seeks to reduce pink and chum production by 25%. What is this based upon? The same proposer has sought hatchery production reductions varying from 24%, 25%, 50% and up to 75%. None of these suggested cuts in production over the last 19 years of proposals are based upon any criteria but arbitrarily thrown out without any methodology on how the proposed cuts in production would benefit fisheries in the AYK region.

- Not Supported by Science

The Alaska PNP Salmon Hatchery Operators have submitted detailed on-time public comments on proposal 78/156 and the scientific information available regarding this proposal. I encourage the board to thoroughly review this on-time public comment.

- Does Not Address a Conservation or Allocation concern

Proposal 78 does not address a conservation or allocation concern in the Prince William Sound region. This proposal is punitive and seeks to reduce the economic viability of the regions enhanced commercial salmon fisheries by 25%. The proposer does not participate in common property fisheries in the region and would be unaffected if passed. Passing this proposal would reduce the annual average ex vessel value of enhanced pink and chum salmon in the region by over \$14 million dollars. This would have a direct negative financial impact on the fishermen, processors and the communities of Prince William Sound.

- Opposed by ADFG

The ADFG has submitted comments on proposal 78 and they are in opposition to this proposal.

Dept of Fish and Game Staff Comments regarding Proposal 78 (PWS Mtg RC 2 pg 198-201)

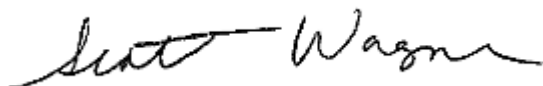
DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Hatchery egg-take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted with consideration of minimizing impact on wild salmon stocks. The commissioner can amend a permit if the hatchery is not in the public's best interest or to mitigate the adverse effects of the hatchery operation. If there is a compelling reason to amend the terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will reduce adverse effects on wild stocks. This proposal did not provide evidence to support that current permitted pink and chum salmon egg-take levels adversely affect wild stocks, in or outside the Prince William Sound enhancement area.

If the board were to adopt this proposal, there would need to be a discussion of how to apportion the egg-take cap because egg-take capacity is set on each hatchery permit. A straight 25% cut to each species at each hatchery may have unintended effects on the production of other species of salmon and may affect harvest allocation, which are a primary concern of the boards of the PNP corporations.

In closing proposal **78** will significantly reduce Prince William Sound pink and chum salmon enhanced hatchery production by 25%. This proposal is beyond BOF authority, cites incorrect regulation, is arbitrary and punitive in nature, lacks science-based support, does not address an allocation or a conservation issue in the Prince William Sound area and is opposed by ADFG. The proposal, if passed, would have tremendous negative financial impacts for Prince William Sound Aquaculture Association, Valdez Fisheries Development Association, as well as the commercial fishermen, processors and communities of Prince William Sound.

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

Sincerely,



Scott Wagner
General Manager

PC456

Submitted by: John Novak

Community of Residence: Anchorage

Comment:

I submit this comment in support of Proposals 51 and 14.

PC456

Submitted by: John Novak

Community of Residence: Anchorage

Comment:

Proposals 63, 64, and 65 are bad public policy. Alaska residents should have opportunities to put fish into their freezers.

PC457

Submitted by: Philip Nuechterlein

Community of Residence: Eagle River

Comment:

Thank you for the opportunity to comment. Please don't take away opportunity for Alaska residents that use the Chitina personal use and Chitina subsistence fisheries to put food on the table.

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

Submitted by: Tracey Nuzzi

Community of Residence: Cordova, AK

Comment:

Please help support PWSAC's ability to conduct cost recovery and obtain their brood efficiently at the Main Bay hatchery. I support ideas in proposals 79, 80, and 81 to find a good solution.

I also support elements in proposals: 46, 47, 49, 54, 55, 62, 64, 65, 66, 67, 68, 69, 71.

I oppose 48, 51, 52, 53, 58 and 59. The Department of F & G have responsibility to manage with tools they deem necessary to ensure escapement (i.e. fishing openers). To remove tools is unnecessary.



OBI SEAFOODS
P.O. BOX 70739
SEATTLE, WA 98127
206-285-6800

November 26, 2024

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

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

OBI Seafoods operates ten shore-based processing plants across Alaska. Our company has over 110 years of history in Alaska seafood processing. Sustainable salmon stocks are the single most important issue to the long-term viability of our company and the ability to maintain our industry's contribution to the state economy. We are steadfast supporters of Alaska's hatchery programs which have provided for Alaska's fisheries for nearly fifty years and appreciate their mission to coincide without adversely affecting salmon stocks.

We have reviewed the proposals slated for discussion at the upcoming Prince William Sound Finfish meeting and have developed the following opinions on proposals that will have significant impacts on the management, allocation, and sustainability of the region's fisheries.

Proposals 51, 52, 53 - OPPOSE

These proposals hinder ADFG's ability to effectively manage the fishery by removing critical tools from local biologists and managers. Current management practices already limit early commercial efforts, and the restrictions outlined in these proposals would cause significant economic harm to the fishing fleet and the surrounding region. Historical data from 2012, 2013, and 2015 demonstrates that excessive escapement can lead to negative impacts on spawner recruitment in future years, as seen in the returns of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, these over-escapement events could have been even more severe, further compounding recruitment declines.

The "run timing curve" or cumulative management objective is outdated, having been developed decades ago, and does not account for the significant variability in run timing from season to season. For instance, in 2013, the run was unusually late, with only 8,206 fish passing the sonar by May 30, compared to an expected



OBI SEAFOODS
P.O. BOX 70739
SEATTLE, WA 98127
206-285-6800

157,321. However, by June 10, the condensed run surged upriver, with a record daily count of 113,977 fish versus the anticipated 12,115. The season ultimately ended with a total escapement of 1,267,060, far exceeding the objective of 695,308. If the proposed regulations had been in place, preventing the harvest of an additional 320,337 sockeye, the over-escapement would have been even more pronounced, exacerbating the decline in spawner recruitment.

Proposals 75, 76, 77 - OPPOSE

Enhancement Allocation Plan (Proposals 75, 76, and 77) unfairly disadvantage the purse seine fleet by effectively excluding them from critical fishing districts like Port Chalmers and Esther in perpetuity. By raising the allocation trigger from 45% to 50% and factoring out the most recent year from the rolling five-year average, the proposals would virtually guarantee that the drift gillnet fleet gains exclusive access to these districts. Furthermore, the inclusion of VFDA-produced salmon—primarily utilized by the seine fleet—in allocation calculations artificially inflates the seine fleet's harvest value, further marginalizing the seine fleet. These changes undermine the balance established in the current plan, which was designed to equitably distribute access and prevent one gear group from monopolizing resources.

This shift represents a significant departure from the carefully negotiated terms of the existing plan, which was crafted to reduce user group conflicts and balance economic opportunities. The drift fleet, having performed well in these shared districts over the past two years, now seeks to change the rules to secure exclusive access. This move contradicts the original intent of the plan to provide fair and equitable opportunities for both fleets. Instead of fostering collaboration and resource sharing, these proposals create a precedent for reallocation based on short-term gains, destabilizing the long-term management goals for Prince William Sound fisheries and jeopardizing the seine fleet's future viability.

Proposal 79 - SUPPORT

All user groups benefit from the success of PWSAC's corporate escapement goals, cost recovery, and brood collection at the Main Bay Hatchery, making cooperation essential. Interference with these operations by any group disrupts efficiency and undermines the resource's future for everyone. Optimal cost recovery opportunities can be limited to just a few days, and delays caused by subsistence or personal use fishing reduce the benefit for all users. This proposal maintains ample access to sockeye salmon for sport and subsistence fishing in areas outside the AGZ in Main Bay, even when PWSAC is focused on cost recovery and



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brood collection. During these times, commercial fishing in the Main Bay Subdistrict is typically closed, granting exclusive access to sport and subsistence users until cost recovery is completed.

Another important consideration is safety. The Main Bay area has numerous large rocks, creating navigation challenges for cost recovery vessels and posing potential risks for all user groups. There have been instances where course adjustments were required to avoid collisions with other vessels, increasing the risk of accidents involving rocks. To address these concerns, it is essential to emphasize that all fishers share a commitment to safe practices, and reducing gear conflicts in the area is critical to ensuring safety and efficiency for everyone involved.

Proposal 96 - SUPPORT

The recovery of Prince William Sound herring populations requires action from the Board of Fisheries to maximize the species' value. Adjusting the annual season dates to align with the calendar year, starting with the spring sac roe fishery, would allow processors and fishermen to better plan their participation. Implementing a rollover of unused quota from the sac roe fishery to the food and bait fishery would address challenges seen in other Alaska herring fisheries and improve overall management.

Proposal 78- Oppose

Proposal 78 is essentially a repetition of Proposal 43, which failed at the Upper Cook Inlet meeting in March 2024 with no new evidence provided to demonstrate that hatchery-produced pink and chum salmon harm Bering Sea stocks, including those of the Yukon and Kuskokwim rivers. The claim that there are no alternative venues for discussing hatchery concerns is misleading, as multiple forums, including Regional Planning Team meetings and the Alaska Hatchery-Wild Interaction research initiative, offer ample opportunities for dialogue. The proposer's lack of engagement in these platforms highlights the availability of other avenues to address these issues.

Reducing hatchery production by 25%, as proposed, would have severe economic consequences, disrupting tax revenues, employment, and the economic stability of salmon-dependent communities. Prince William Sound alone supports over 2,200 jobs and generates \$315 million in annual economic output through hatchery activities. A reduction of this scale would devastate communities like Valdez, Seward, and Cordova, while increasing pressure on wild stocks by limiting harvestable hatchery-origin fish. This proposal fails to acknowledge the critical role hatcheries play in stabilizing both wild returns and local economies.



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206-285-6800

Alaska's hatchery programs have operated for 50 years under rigorous scientific oversight, ensuring sustainability and complementing wild salmon stocks. Certified by the Marine Stewardship Council and Responsible Fisheries Management, these programs alleviate fishing pressure on wild stocks and support ecological resilience during periods of environmental stress. Hatcheries are essential to Alaska's economy and cultural fabric, providing a stable salmon resource for all user groups and safeguarding access for future generations. For these reasons, the Board of Fisheries should reject Proposal 78 and continue to support Alaska's hatchery programs.

Thank you for the opportunity to provide comments on these important matters. We deeply appreciate the time, effort, and careful deliberation that the Board dedicates to reviewing each proposal. Your commitment to ensuring a fair, transparent, and well-informed process is critical to the sustainable management of Alaska's fisheries and the preservation of the diverse communities and industries that depend on them. We recognize the complexity of these issues and the challenges inherent in balancing competing interests while upholding the principles of conservation and responsible resource use. Your thoughtful consideration of stakeholder input helps ensure that decisions are made with the best possible outcomes for Alaska's ecosystems, economy, and people.

Sincerely,

John Hanrahan, CEO

Submitted by: Elaine O'Brien

Community of Residence: Kodiak

Comment:

I urge the BOF to halt the PWS trawl pollock fishery until it is proven that fishing occurs midwater, as required by regulation. Recent data show that pelagic gear is in fact on the bottom up to 85% of the time. I also urge the BOF to implement an observer program on the trawl vessels in PWS.

Patrick O'Donnell | F/V Caravelle



Kodiak, Alaska 99615

November 26, 2024

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:

My name is Patrick O'Donnell and I have lived and fished out of Kodiak for 35 years. I own and operate an 85-foot trawler, which is truly a family business that employs my daughter, son and brother, along with four to five additional crew that live in Kodiak. My vessel operation directly supports seven families on an annual basis, and all of my repairs and maintenance take place in Kodiak which further supports local businesses.

I have been fishing Prince William Sound (PWS) since 2002 when I first purchased my vessel, and PWS is an important part of my business. The PWS fishery allows me to start fishing earlier in the year, around January 20th, as typically pollock do not aggregate around Kodiak until mid-February. This allows my vessel and crew to earn a living in a period of time when we would otherwise not be fishing, and allows the processors in Kodiak to start processing which in turn creates jobs for our local resident processor workers.

The Prince William Sound Pollock fishery has operated for almost three decades. The fishery was established in 1995 with almost all deliveries going to Cordova, and when Cordova stopped processing pollock the trawl deliveries went to Seward. When Cordova and Seward stopped processing pollock the deliveries shifted to Kodiak. With recent changes in the processing sector and changes in ownership there could be potential opportunities for processing pollock in Cordova, Seward, or Valdez. This would create jobs and be a huge benefit for these communities, as well as making the fishery more cost effective for our vessels by reducing the cost of fuel necessary to transit back and forth from Kodiak. However, all of this potential economic activity will be impossible if the pollock fishery is shut down.

The PWS pollock fishery is closely monitored and actively managed by ADF&G. First, there are spatial harvest limits to ensure all of the catch does not come from one area. For example, the management plan divides the pollock fishery into three different management areas, once harvest from any one of the three areas reaches 60% of the GHL the fishery within that particular area will close by emergency order for the remainder of the season.

Second, there are bycatch limits and constant monitoring to ensure the fishery is shut down immediately if those limits are reached. For example, the bycatch limits for salmon and rockfish are 0.04% and 0.5% respectively. In the last 15 years the rockfish cap has been exceeded once, and the salmon cap exceeded twice. The department is able to closely monitor catch because it limits participation to five to seven vessels at a time, requires vessels to check in when they enter the sound, and to report catch on a tow-by-tow basis. Vessels are required to retain all bycatch, and ADF&G will require offloads before allowing additional vessels to deploy gear in order to ensure accurate counts and weights of bycatch. In this way the department monitors all trips and bycatch closely and is able to shut down the fishery by Emergency order quickly.

In regard to Proposal 17 ADF&G has authority to assign Observers on Trawlers fishing PWS at anytime during the season, but is not authorized to require EM. Carrying an observer is not an issue for the trawl fleet and the majority of the Kodiak trawl fleet also participate in the EM (electronic monitoring) program in federal fisheries.

As for claims that pelagic trawls are fished on the bottom in PWS, trawl operators are not going to risk losing or damaging \$300,000 worth of pelagic trawl gear by putting it on the bottom. I am including the following in "trawl gear": pelagic trawl doors, dyneema bridles, midwater net, salmon excluder, packer tube and codend, as well as approximately \$80,000-\$100,000 worth of electronics and sensors on the net and codend. Further, most of PWS has not been surveyed or charts updated since the 1964 earthquake, and current charts clearly state that the depths on the charts may be inaccurate due to shifting seafloor as a result of the 1964 earthquake. Putting \$300,000 worth of trawl gear on the seafloor in PWS is recipe for disaster.

Finally, there is also a concern among salmon fishermen that closing down PWS to pollock fishing will lead to increased predation on pink salmon fry by pollock. Studies (*see attached*) indicate that pollock predation on salmon fry is greatest from April through June, and the PWS pollock fishery removes some of those pollock from the water early in the year. Not harvesting pollock in PWS will lead to higher levels of predation on pink salmon fry.

I am opposed to Proposal 14, 15, 16, & 17 and ask that the board take no action on all four proposals.

Thank you,



Patrick O'Donnell, Owner/Operator
F/V Caravelle

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.

Old Harbor Native Corporation
Fisheries Committee
Freddy Christiansen, Chairman
Proposal 78 Comments

We encourage the Alaska Board of Fisheries to take no action on proposal 78. We don't believe the Board has the information necessary to make an informed decision regarding the reduction of hatchery produced salmon in Price William Sound or other areas of Alaska. Should the Board take action to reduce the hatchery production in Prince William Sound, we're concerned that your decision will be based on bias, prejudice and political considerations, not Science and sound salmon management practices.

First the Board needs to articulate the problem you are trying to solve. Proposal 78 makes passing reference to Chinook salmon on the Yukon and more vaguely to Chinook declines in other Alaska river systems. Is the decline of Chinook salmon in the Yukon River the problem the Board is addressing? Is it Chinook salmon on the Copper River? (The Copper River met it's Chinook salmon escapement goals this past season.) In other words, by defining the problem the Board is attempting to solve, you will clarify whether or not Proposal 78 solutions are realistic or effective. We think not.

The preponderance of assessments regarding the impacts on wild salmon stocks from hatchery released salmon show no impact or are inclusive. Proponents of Proposal 78 focus on a limited number of studies, mostly by the same few authors, that show some correlation between hatchery released salmon and impacts on other species. These studies, at best, show correlation but not causation. Moreover, these studies all assess hatchery released salmon in the aggregate and don't identify or classify PWS hatchery released salmon by species, diet or migratory patterns apart from all hatchery released salmon. In other words, the studies cited by the proponents of Proposal 78 presume that PWS hatchery released salmon have a proportional negative impact based on the number of PWS hatchery released salmon compared to the total number of hatcheries released salmon from all sources. (Asia, Russia, Canada, Washington, Oregon, California etc.) This is a huge presumption and the Board should not make hatchery reduction decisions without PWS specific impact information.

On what basis can the Board conclude that PWS hatchery released salmon have the same proportional impacts as all other hatchery salmon releases? Does the Board know that PWS salmon have the same migratory patters as all other hatchery released salmon – both spatially and temporally? Are these impacts broken down by salmon species? Can the Board conclude that all hatchery released salmon are eating the same thing. For example, if the proponents of proposal 78 are concerned about Chinook salmon, what is the evidence that PWS hatchery released pink and chum salmon are eating the same diet as Chinook salmon, migrating in the same area as Chinook salmon or otherwise inhibiting the recovery of Alaska's Chinook salmon? Isn't it more probable that the substantial number of Chinook hatchery releases from Canada, Washington and Oregon hatcheries are more likely to have an impact on Alaska origin Chinook salmon? In short, any broad generalizations about the impacts of hatchery released salmon on any and all wild salmon species may or may not apply to PWS hatchery releases and PWS hatchery releases may or may not have a negative impact proportional to all hatchery releases. We just don't know.

Related to the assessment in the literature assessing cumulative hatchery released salmon's impact on wild stocks is a question of why a 25% reduction. If there is a significant impact shouldn't the reduction be 50% or more and if there isn't a verifiable impact, why consider a reduction a reduction? A 25% reduction is both arbitrary and capricious. The safe harbor for the Board is to maintain the current policy,

now more than two decades old, and not allow any increase in PWS hatchery releases rather than contemplate a reduction.

The Board is often faced with balancing equities. The impacts of a Board action are balanced with what the Board hopes to accomplish? Bluntly stated, the Board simply does know what you will accomplish by reducing the number of hatchery released salmon in PWS. Will Canada or Washington or Oregon or Japan also reduce their hatchery releases? Will ocean temperature be warmer or colder and food more or less available for all salmon. Will in-river or near shore survival of Chinook salmon increase so that Alaska origin Chinook are actually surviving to maybe compete with hatchery released stocks? In contrast, what the Board does know is that reducing hatchery releases in PWS will reduce the commercial catch, reduce harvesting and processing jobs, reduce community revenues, risk PWSAC loan obligations, reduce sockeye, coho and chinook enhancement programs and generally undermine the economic and social fabric of Alaska fishery dependent communities and Alaska fishermen that rely on PWS hatchery released salmon. As a Board member, balancing what you do know with what you don't know, we recommend you stick with the status quo.

Very Truly Yours

Freddy Christiansen

Old Harbor Native Corporation Fisheries Committee

Submitted by: Daniel Oleniczak

Community of Residence: Eagle River

Comment:

Oppose #63, #64 & #65. Stop hurting the sport fishermen and start limiting the loneliness and commercial net fisheries.

Submitted by: Phil Oman

Community of Residence: Cordova, AK

Comment:

Please see attached.

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

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 49 years experience in the area E drift 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,

Phil oman



Cordova

Submitted by: Kelsey Opstad

Community of Residence: Valdez Alaska

Comment:

see attached

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

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 submitting these opinions on BOF proposals as an individual with great stake in the Area E drift gillnet fishery. I have been an Area E permit holder since the 2013 season. Prior to that I worked as a deckhand for 3 years in the same fishery, in order to learn and qualify for the state loan program. I began fishing at 19 years old, and have built and sustained my life on the profits of the fishery. These profits extend beyond that of financial gain. This fishery provides a rich lifestyle unknown to many, and greatly appreciated by those of us lucky enough to be involved. I have also gained experience by working as a seine deck hand, both in Prince William Sound and Sitka. I think this diversity gives me a bit more perspective on the fishery overall. Thank you for your time, and I hope my opinion will be valued.

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,

Kelsey Opstad


Valdez 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: Shawn ORear

Community of Residence: North Pole

Comment:

I'm a life long Alaskan and use the Copper river dipnet fishery to feed my family. The restrictions being proposed will

Limit my ability to eat a well balanced diet of salmon that is good for myself and my family's well being.

Submitted by: Kenny Overvold

Community of Residence: Anchorage

Comment:

Prop #15 and Prop #14. I am in favor of adopting both.

Meeting INRIVER use is the only way. Our salmon returns are getting decimated by trawling in Prince William sound. We need our salmon to return to the rivers and streams in the Copper River drainage

Märit Carlson-Van Dort and Members of the Board,

My name is Emma Owecke. I grew up commercial fishing as a setnetter in Prince William Sound. I have been a permit holder in the Sound for 11 years, and a deckhand for 4 years prior.

Proposal 46 & 47 - Support

In season reporting is the simplest way to gather data and manage a fishery.

Proposals 56 & 57 - Oppose

I oppose these proposals, as they would allow permit stacking in the Eshamy District. The Eshamy District is the only district in the Sound where setnetting occurs. Allowing drifters to stack their permits would put setnetters against a big barrier. If either of these proposals were to be implemented, the Eshamy District would need to be excluded.

Additionally, I strongly oppose one permit holder being able to own and operate two permits at one time from a single vessel. One permit holder should only be able to operate one permit at a time. This is how all fishing permits (drift, seine, setnet) in Prince William Sound currently operate, and is the fair way.

Proposal 79 - Support

Completing cost recovery in Main Bay has been a struggle for years. There are often too many fishing boats to conduct cost recovery in a timely manner, resulting in large numbers of fish deteriorating in quality. Getting cost recovery is essential for the future of the hatchery, and no fishermen should get in the way of cost recovery being completed effectively. No commercial fishing, sport fishing, subsistence fishing, or personal use fishing, should be in effect inside the THA, SHA, or AGZ while the hatchery is working to complete cost recovery. The hatchery is the reason all types of fishermen are able to fish here, year after year. We must ensure that the hatchery is able to run effectively.

Proposal 80 - Support

This proposal would eliminate damage to the Main Bay Hatchery barrier seine. This is a clear and obvious fix to an ongoing problem. This proposal would still allow for effective fishing, while reducing the property damage to the barrier seine. Additionally, this proposal would protect the fish behind the barrier seine which are being collected for broodstock, the most essential piece to running the hatchery. These fish need to be protected.

Thank you for your time,
Emma

2024 BOF Comments

Madam Chair and Members of the Board,

Thank you for your attention to the equitable use of, and protection of our fishery resources. My name is Paul Owecke, I reside in Trempealeau, Wisconsin. I have been a PWS setnet permit holder since 1983 and continue to be active in the fishery. I have made participation with the BOF process a priority throughout my career.

Proposals 46 and 47-Support

In season reporting should now be a priority in order to adequately manage these ever expanding fisheries. With the expanding use there needs to be timely reporting in order to effectively manage harvest among the various user groups.

Proposal 48-Oppose

Monetizing subsistence will destroy the resource.

Proposal 49-Support

Monetizing subsistence will destroy the resource.

Proposals 51,52,53-Oppose

The dynamic aspects of the fishery demand dynamic and adaptive management tools to protect the resource at the same time providing harvest within logical parameters. These proposals lock in prescriptive actions that will restrict the ability to manage for sustainable fisheries whether commercial, sport or subsistence.

Proposal 55-Support

Consistent conservation measures throughout this system assures that protection of the resource is shared equitably.

Proposals 56 and 57-Oppose

Although there are compelling reasons to approve permit stacking in PWS, there absolutely must be an exclusion for the Eshamy District. The Eshamy setnet fishery is one of the longest running fisheries in Alaska with federal data beginning in the late 1800's and a historical indigenous fishery predating this. It is also one of the smallest salmon management districts in Alaska. It also is home to the largest sockeye salmon aquaculture facility worldwide. The 28 permit setnet fishery operates within the District alongside the 525 Drift gillnet permits in the fishery.

In the 1983-84 BOF cycle the setnet user group voluntarily reduced their permissible gear length from 100 to 50 fathoms within the THA of Main Bay in order to give access to the drift fleet within the most productive harvest area of the Eshamy District. Even with these concessions there has been ongoing and escalating conflicts between drift and stationary setnet gear district wide because of the limited area within the district that allows the current 150

fathom drift gillnet length. Please confer with any Protection Officer familiar with PWS to verify this situation. To increase the gear length to 200 fathoms will ensure a level of conflict beyond the current situation that will adversely affect all participants. An exclusion of the Eshamy District to permit stacking is critical if there is to be any expectation of an orderly and safe commercial fishery.

Proposal 58 and 59-Oppose

Proposal 60 and 61-Support

Proposal 62-Support

Proposal 63-Oppose

Proposals 64,65,66,67-Support

Proposal 68 and 69- Support

Proposal 70-Oppose

Proposals 71 and 72-Support

Proposals 75,76,77-Oppose

The current version of the PWS allocation plan has proven over time to be a reliable means to provide all user groups with a framework to assure equitable levels of harvest value to maintain economic viability for each gear group and permit holder.

Proposal 78-Oppose

There is no evidence that a reduction in hatchery production will have any significant impact on wild stock production. A reduction in hatchery returns that would result from approval of this proposal would have the effect of increasing harvest effort on wild stocks in PWS.

Proposals 79,80,81-Support

It is imperative these proposals be implemented in order to allow PWSAC to conduct cost recovery operations without interference by any party. With the rapidly expanding sport snagging fishery occurring in the area where cost recovery seine operations are conducted I have observed directly sport boats intentionally interfering with the seine operations and preventing deployment of seine gear for cost recovery. There also has been numerous times where the effectiveness of the barrier seine has been compromised by the number of lost snagging hooks aggregating web and lifting the seine with rising tide and releasing broodstock from the holding area or allowing excess fish access to the holding area for broodstock.

This is an important enough issue that the commercial fleet is ready to forego fishing area and fishing time within Main Bay in order to safeguard cost recovery efforts. All user groups need to have parameters in place to protect cost recovery and hatchery operations.

Proposal 83-Oppose

Proposal 84-Support

Proposal 85-Oppose

Proposals 86,87,88 Support]

Paul Owecke

Submitted by: Quinn Owens

Community of Residence: Palmer / Fishhook

Comment:

As a resident, angler, subsistence fisher, outdoorsman, and concerned community member I support the following proposals: 48, 58, 59, 70

In the same light, I opposed the following proposals as they directly impact me, my family, and my communities direct engagement of allocating food resources for the year as well as handing those resources directly to other bodies looking to profit on an already dwindling resource that is poorly managed due to commercial fishing, NOAA, and the Alaskan & Federal governments.

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



November 26, 2024

To: Alaska Board of Fisheries

RE: Opposition to Proposals 14, 15, 16

Dear Chair Carlson-Van Dort and Board Members,

Pacific Seafood Processors Association (PSPA) strongly opposes Proposals 14, 15, and 16 on the Prince William Sound pollock fishery. PSPA is a seafood trade association comprised of major Alaska seafood processing companies that operate 34 facilities in 21 coastal communities across Alaska, including those in Prince William Sound (PWS) and Kodiak. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska seafood each year and include shore-based processors that have historically participated in and are fully dependent on PWS salmon and groundfish fisheries. They have been at the forefront of supporting management systems based on sound science and sustainability principles and have invested heavily in infrastructure and operations in Alaska's remote communities.

We oppose Proposals 14 – 16 because the PWS pollock fishery is an important piece of the diverse fisheries that local fishermen (about 14 – 15 vessels) and processors depend on, and it is a fishery with little relative incidental catch compared to many gear types. ADFG estimates the direct losses in fishermen's annual harvest revenue from closing this state water fishery would be just over \$1 million. The claims against its impacts in the Bering Sea are grounded in speculation, not scientific data or conservation benefit. Please reference the ADFG staff comments in opposition to all four proposals.

Proposals 14 and 16: We oppose closing the fishery. This is a legitimate fishery that Alaskans participate in and depend on, with deliveries and tax revenue primarily benefiting the community of Kodiak. There is no rationale provided to close the fishery, nor evidence that bottom contact is having an adverse or more than temporary effect on benthic habitat. Instead, data show the incidental catch of all non-targeted species averages 1.2% of the total weight of the catch, well under the 5% limit in regulation (Table 15-2, p. 35, and Figure 16-1, p. 38 of ADFG staff comments). Harvest is retained (there is not a practical opportunity to sort or discard fish at sea given the gear type) and all catch is delivered to shoreside processing plants in Alaska and target and incidental catch is reported on the fish ticket. The proposals are arbitrary and harmful, with no compelling reason or scientific evidence presented to justify the closure.

Proposal 15: We oppose changing the current bycatch limits to an unspecified number of pounds. First, it is unknown what range of pounds the Board might consider, which makes it impossible to evaluate

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potential impacts, either positive or negative. Second, implementation of such an approach does not incentivize any vessel to continue to reduce its bycatch rate throughout the fishing trip, unlike the status quo. The current bycatch limits (<5% of weight catch) allow for flexibility in the rate throughout the duration of the trip but still provide a limit on specific species within that trip, including salmon, which is limited to 0.04% of the total round weight of the catch. Trip limits also limit the amount of harvest per vessel per trip. In addition, ADFG already has EO authority to change bycatch limits in response to conservation concerns or other factors and has used this authority in the past. **Recall that the current approach has resulted in an actual incidental catch rate much lower than the regulated limit in almost every year (average 2016 – 2023 = 1.2% for all species combined and 0.02% for Chinook salmon. Limits are 5% and 0.04%, respectively).**

Many communities across Alaska depend on the seafood industry – the current economic crisis driven by poor global markets and other economic factors has emphasized this point. Closing an Alaska fishery without cause is poor precedent and only harms Alaska and its fishing-dependent communities, without any positive benefit.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Julie Decker", with a stylized, cursive script.

Julie Decker
President, PSPA



November 25, 2024

To: Alaska Board of Fisheries

RE: Opposition to Proposal 78

Dear Chair Carlson-Van Dort and Board Members

Pacific Seafood Processors Association (PSPA) strongly opposes Proposal 78. PSPA is a seafood trade association comprised of major Alaska seafood processing companies that operate 34 facilities in 21 coastal communities across Alaska, from Ketchikan to Cordova to Unalaska. PSPA member companies purchase, process, and market hundreds of millions of pounds of wild Alaska seafood each year and include shore-based processors that have historically participated in and are fully dependent on the salmon fisheries in Prince William Sound (PWS). They have been at the forefront of supporting management systems based on sound science and sustainability principles, have invested heavily in infrastructure and operations in Alaska's remote communities.

Hatcheries in PWS region and across Alaska are critically important to both fishermen and processors, especially in times of downturn, to help stabilize the situation for Alaskans that are dependent upon salmon. In terms of economic impact, hatcheries generate \$576 million in annual economic output and provide 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. Processors need the volume of salmon to stay viable and operational for all fisheries, and hatcheries provide the supplement to wild stocks they were intended to provide.

Hatcheries were established differently in Alaska with significant and necessary restrictions in the form of Alaska's Sustainable Salmon Policy and Genetic Policy. They are enhancement programs historically supported by the state for the benefit of all Alaskans – subsistence, personal use, sport, commercial. The research that is ongoing through the Alaska Hatchery Research Project is critically important to support and monitor, as it is at the forefront of our understanding of *local* impacts of pink and chum salmon hatcheries, as implemented under the policies established by the State to protect wild stocks. **Thank you for providing a presentation on this ongoing research at this meeting.**

Opposition to Proposal 78 is grounded in the need to protect sustainable hatchery production in PWS and around the state. Reducing egg take by 25%, as proposed, will have a significant economic impact and harm resident fishermen of all types and processors dependent on this production. For commercial fishermen alone, ADFG estimates a loss of \$11 million in pink salmon harvest revenue and \$3.6 million in chum salmon harvest revenue as a result of the proposal, not including losses to processors, tenders, support businesses, sport fishermen, subsistence, or the resulting downstream effects on communities like Cordova and Valdez. This is not the time to harm salmon fishermen, especially for no benefit to any other fishery or stock. The proposal fails to acknowledge the public process and any scientific basis for action, and simply will not benefit Yukon River Chinook salmon returns as the proposal implies. In sum, PSPA opposes Proposal 78 for the following reasons:

Iterative Public Process: Hatchery-permitted egg take levels are established through an iterative and public process involving department staff, hatchery operators and stakeholders. This comprehensive process, the results of which many have made fishing business decisions, should not be negated or circumvented by this proposal.

Lack of Evidence/Conservation Benefit: The proposed reduction in egg take levels lacks a supported or demonstrated conservation benefit. No scientific evidence has been presented in the proposal to support the proposed reduction in PWS permitted salmon egg take levels, and certainly not for its impact on other wild stocks in the Bering Sea. The absence of compelling data or analysis supporting the reduction for conservation reasons undermines the proposal's basis and raises questions about its potential impact. ADFG states there is no evidence to support that current permitted pink and chum salmon egg take levels adversely affect wild stocks, in or outside the PWS enhancement area (p. 201).

Department Oversight: The Commissioner and ADFG are the primary authorities over the regulation of hatchery operations, and they take this role very seriously. Every region has a Comprehensive Salmon Enhancement Plan, approved by the Commissioner, per state regulation. Since 2019, the Commissioner has not allowed increases in the permitted number of pink and chum salmon eggs. ADF&G opposes the proposal on the grounds that hatchery operations are permitted such that they minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise.

Lack of impact: The PWS hatchery component is a small fraction of the total chum and pink salmon abundance across the Pacific. Please reference the 2018 Ruggerone et al paper,¹ which includes data to show that all Alaska pink and chum salmon are a minor proportion of the total salmon competing for food in the marine ecosystem, let alone hatchery salmon (Fig. 6). For PWS hatchery chum, for example, it is <2% of total chum returns from the North Pacific Ocean (Fig 6).

In addition, further constraining Alaska production, which is subject to Alaska's unique policies to protect the genetic integrity of wild stocks and increase productivity of regional enhancement programs, harms responsible US fisheries for no benefit while foreign hatchery releases continue to dominate the marine ecosystem. The North Pacific Anadromous Fish Commission reports that chum salmon hatchery releases by country have been relatively consistent across the past decade with the exception of Russia, which has increased production by an average of ~0.3 billion over 2019 – 2021, representing an approximately 43% increase over their previous releases. Japan releases the most hatchery fish (10-year average 1.63 billion), followed by Russia (0.78 billion), and the United States (0.73 billion). Canada and Korea each release less than 0.1 billion. Chum hatchery releases across the Pacific Rim are shown below by country from 1952 to 2021 (Figure 6-4; NPAFC 2022).

¹Ruggerone, G. and Irvine, J. (2018). Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean, 1925–2015. *Marine and Coastal Fisheries: Dynamics, Management, and Ecosystem Science* 10:152–168.

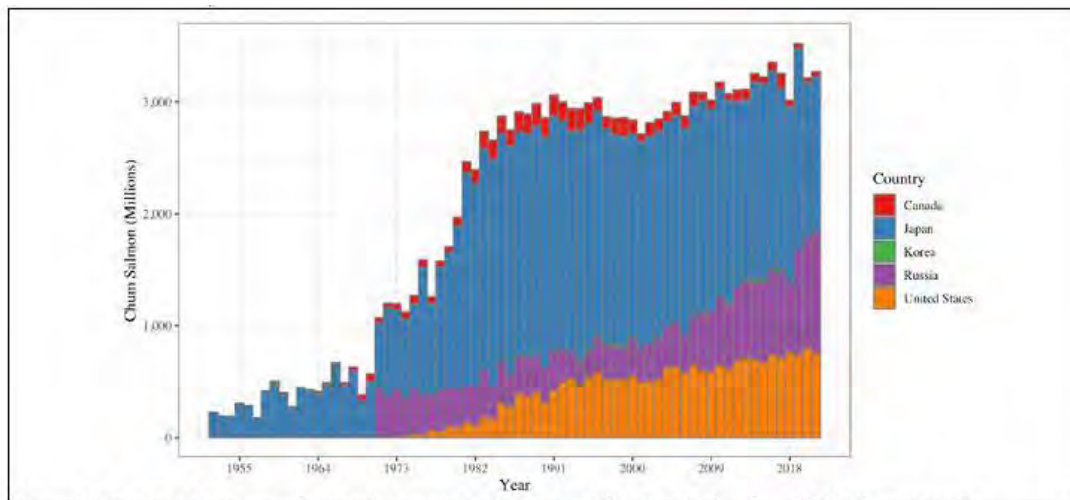


Figure 6-4 Total hatchery chum salmon production around the Pacific rim from 1952 through 2021

The Alaska seafood industry is facing economic conditions unlike any since the collapse of salmon value in the 1990s, except this time, it is across multiple species and challenging the long-term viability of Alaska's fisheries. NOAA recently estimated Alaska's seafood industry lost \$1.8 billion in 2022–2023,² and the stress on the processing sector is evident through multiple processing plant closures, sales, and restructuring on a large scale. The economic impact is only one metric but is representative of the severe impact on thousands of Alaska businesses and fishing families.

Today's problems are a result of the confluence of multiple global and national economic factors occurring simultaneously (strong US dollar affecting export sales, increased labor, energy, and other operational costs, increased cost of borrowing money, increased farmed and foreign competition, inflation affecting consumer demand), including extremely poor global markets. These are factors directly affecting the viability of Alaska's commercial fishing and processing sectors that are outside of BOF authority and control, but they are critical to understanding the fisheries the BOF manages. We are working on many fronts to address these challenges, and individual processors and fishing businesses are restructuring and trying to find efficiencies to get through this period. All fisheries are critical to the viability of fishermen and processors, especially right now.

Many communities across Alaska depend on the seafood industry – this economic crisis has emphasized this point. Reducing PWS hatchery production by 25% would add another economic blow to the seafood industry, sport and subsistence salmon harvesters, and fishing-dependent communities, without positive benefit.

Thank you for your consideration.

Julie Decker
President, PSPA

² <https://www.fisheries.noaa.gov/s3/2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf>

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 fisherman and own a seiner. The hatcheries are the bedrock of our community and economy.

We need stability in fisheries now more than ever. A decrease that substantial would threaten the viability of the economic business model and risk buyers leaving our region, effectively killing our industry. The state needs to seriously consider whether they want commercial fisheries in this state or not. Last year's catch value was one tenth of Q3 sales in Norway. Demonizing our hatcheries is not the solution to any problem.

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,

Casey Pape

[REDACTED]

Cordova, Alaska & Anchorage, Alaska

Submitted by: Joshua Parsons

Community of Residence: Fairbanks

Comment:

As we have recently seen in Kodiak, commercial fishing is the number one devastating contributing factor to our fisheries. The commercial side needs to get under control before there are no fish left for anybody.

Submitted by: Darin Patrick

Community of Residence: Anchorage

Comment:

Please conserve our natural resources! There is no fish/game left the way it is, please do not liberalize anything anymore! I would really like to see the children enjoy the sport of fishing and hunting, but it is rarely possible in alaska anymore because of the limited fish/game resources available, and the large amount of people pursuing the few opportunities available-

More restrictions or closed seasons should be started rather than raising the limits! I cannot even believe how poor most of Alaska's game populations are currently! It is absolutely an embarrassment. Stop the harvesting! Conservation!

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

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 an owner operator in PWS for nearly 15 years both seining and gillnetting for salmon.

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,

Amelia Patterson

[REDACTED]

Moab, Utah

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

Submitted by: Mark Paul

Community of Residence: Eagle River

Comment:

I have had the opportunity the past two years to participate in the Copper River Personal Use fishery via boat through a commercial guide service, and is the only way I feel safe dipnetting the river. The personal use fishery contributes greatly to my family's food security by giving me the opportunity to keep my freezer stocked with high quality salmon. I strongly oppose prohibiting guide services from providing access to the Personal Use fishery via boat.

Submitted by: Seth Payment

Community of Residence: Soldotna

Comment:

Any trawl fishery in Alaska is harmful to a sustainable future for our fisheries and economy. This has been shown by bycatch reports in the recent years and low salmon returns. First the kings now the silvers have dwindled substantially in the last ten years. Managing wild fish populations with hatchery fish instead of actually addressing the over consumption is by far the dumbest things the state has done. I hope you listen to the residents that would like to see the fisheries return for the future.

Submitted by: Lisa Peltola

Community of Residence: Anchorage

Comment:

I am writing because I am extremely concerned about the ongoing attack on long time residence who rely on dipnetting to feed their families. It seems that we continue to support the destruction of our fisheries by the commercial industry with no regard for those of us (who live here year round) who count on these fish. I have noted below the proposals that I do not support and cause me great concern about my ability to feed my family in years to come. I also listed the 4 proposals that I do support (48,58,59,70).

Why do you continue to impose regulations that punish local residents while rewarding commercial boats which are mostly run by folks that do not reside here year round and take most of the money they make out of state? I do not own a boat and would lose my ability to fish if I could not go out on a commercial operation. Please help and support the local residents that count on these fish to survive, it's the proper thing to do.

Submitted by: Reginald Peratrovich

Community of Residence: Anchor Point

Comment:

14, 15, 16, 17

I want trawling to be banned, or at least bycatch to be significantly and severely reduced.

Submitted by: Robert Perkins

Community of Residence: Fairbanks

Comment:

ADF&G manages the "Chitna Fishery" very well under the current regulations.

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, sport, and public use fisherman. For four years, I have participated in hatchery cost recovery, commercial seine and gillnet fisheries around south central Alaska.

Please vote AGAINST proposal 78. This proposal would disable the ability of the aquaculture associations to operate in the difficult current conditions of the changing salmon industry. The pink and chum production at its current level is critical to production of all 5 species throughout the Pws watershed. The sockeye, coho and chinook production are all critical for sport , personal use, commercial and wildlife/habitat. Any one or two of these species cannot support itself or the other salmon species. The changing environmental conditions including resource development, mining, logging, land development, harvest reallocation, climate change, water allocation/shortages, water temperature changes. All these play an integral role in the stresses on natural stocks.

The strength of the pacific salmon is its resiliency. As we have all learned, one year can be one of the worst returns and the very next can be one of the best returns. Unfortunately, the public can be reactionary to the present conditions without consideration of near and distant future years. Thank you for your consideration and please vote to OPPOSE proposal 78

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,

Chris Perry



Homer, Alaska



November 26th, 2024

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

Re: Opposition to Proposals 5 & 78

Dear Chairwoman Carlson-Van Dort,

Petersburg Vessel Owners Association (PVOA) is a mixed gear fleet of vessels that operate in State and Federal fisheries in Alaska and the West Coast. PVOA's members participate in fisheries of all gear types and rely on the sound management of fisheries resources to ensure the viability of their businesses and Petersburg as a community. PVOA has taken position on the following proposals for the November 26th Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (Except Shrimp) Meeting.

Proposal 5 – Oppose

PVOA is opposed to proposal 5. PVOA sees this proposal as an attempt by ADF&G through Board of Fisheries action to establish regulatory authority over the federally managed halibut longline fishery. The basis for this proposal is in conservation of the PWS rockfish population, yet the commercial fishery GHLL is often not reached, let alone exceeded. ADF&G has EO authority over several other fisheries that operate in PWS that would also lead to reduction in commercial rockfish bycatch, yet this authority is rarely used, as the need for rockfish conservation is rarely necessary based on GHLL triggers. Because of this, PVOA sees this proposal instead as an attempt by the State to take regulatory control of a federal fishery under the management of the International Pacific Halibut Commission, instead of using its authority over its own fisheries to solve a problem that often does not exist.

Proposal 78 - Oppose

PVOA is opposed to proposal 78. PVOA sees proposal 78 being based on unfounded assumptions that there is a negative relationship between the release of hatchery reared and wild salmon. Current data shows that hatchery programs have minimal effect on the wild populations, but the fact that the State's hatchery programs have been in operation for 50 years and we have seen continued sustainability in the wild stocks in areas where hatcheries are located shows that they can coexist, let alone thrive. While there is little evidence of stock risk from hatcheries there is no data provided by the proposer of stock benefits that would be actualized with the arbitrary reduction in egg take by 25%. PVOA sees this as an attempt by an outside party without involvement in the commercial fisheries attempting to undermine ADF&G's ability to sustainably manage hatchery programs.

While there is no data that there would be stock benefit of decreasing hatchery egg take by 25%, there is significant data on the deleterious financial effects on the harvesters, processors and communities that have built businesses on the track record of hatchery supplementation and sustainability of the coexisting wild stocks over the last 50 years. In PWS alone, hatcheries contribute to \$315 million in total economic outcome annually, providing jobs for fishermen, hatchery employees, processing employees and all other related support services that support the fishing industry as a whole. We do not need to make assumptions on how a decrease in salmon returns would impact local communities in PWS, as it can be seen now, following the 2024 salmon season. The impacts of decreased salmon production are real and will be felt by the fishermen, businesses and communities that rely on them.

PVOA would like to thank the Board of Fish for their considerations and providing the opportunity for public comment in lead up to the 2024 PWS and Upper Copper River/Upper Susitna meeting. We would be happy to answer any further questions by phone or email at pvoa@gci.net.

Sincerely,



Nels Evens
Executive Director

Submitted by: Rick Peterson

Community of Residence: Fairbanks

Comment:

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

Submitted by: Tuayan Phillip

Community of Residence: Anchorage

Comment:

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

I Support: 48, 58, 59, 70



SEAFOOD PRODUCERS COOPERATIVE

SMALL BOATS • INDEPENDENT FISHERMEN • CO-OP VALUES

November 25, 2024

Alaska Board of Fisheries
Board Support Section
ATTN: Board of Fish Comments
PO Box 115526
Juneau, AK 99811-5526

Re: Opposition to Proposal 78

Dear Chairwoman Carlson-VanDort,

Seafood Producers Cooperative is a member owned association of seafood harvesters. We have, continuously since 1944, harvested, processed, and marketed Alaskan Seafood resources in both State and Federal fisheries. Our SPC fisherman are participants in a variety of Alaskan fisheries, from Dixon Entrance to the Western Aleutians.

All 380 members are invested in Alaska's existing salmon hatchery programs and their contributions to common property harvest.

We thank you for the opportunity to submit our opposition to proposal 78. We strongly support and emphasize both the testimony provided to you by the Alaska PNP salmon hatchery operators, and United Fishermen of Alaska.

Sincerely, Norman L. Pillen , President-Seafood Producers Cooperative

Norman L Pillen

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 seining for 13 years now, starting in Lower Cook Inlet and currently participating in the PWS seine fishery. My partner and I have invested into this fishery for the past 5 years and our livelihoods are dependent on the hatchery programs. Alaska's biologists have always been actively involved in management and safeguarding wild fish stocks, I am confident that they can continue to do so without such drastic and unnecessary measures.

Because of hatcheries, we are able to provide for ourselves through seining and working at a seine net shop in the winter. The salmon runs (hatchery in particular) provide us and many in our community with year round work. Should Proposal 78 be adopted, we likely wouldn't be able to make ends meet, considering it would impact us directly via our active fishing career and indirectly by providing less work for us in the winter when we spend time building/repairing seine nets.

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,

Brooke Poirot

A solid black rectangular box used to redact the signature of Brooke Poirot.

Homer, Alaska

PC487

Submitted by: Elena Polushkin

Community of Residence: Honer/ cordova

Comment:

I'm opposing on 51, 52, and 53. I don't agree on them.

PC488

Submitted by: Markian Polushkin

Community of Residence: Wasilla

Comment:

I oppose proposition 51,52,53.

PC488

Submitted by: Markian Polushkin

Community of Residence: Wasilla

Comment:

I oppose proposition 5 and 7. I also support proposition 76

PC489

Submitted by: Lazar Polushkin

Community of Residence: Homer

Comment:

Lets be fair!

Submitted by: Chad Pomelow

Community of Residence: WASILLA

Comment:

#51 I support this proposal. It is time for the policy makers to realize the negative impact commercial harvest levels have on the residents of Alaska. As a resident, I should not have to purchase fish in order to feed my family. I am completely capable of harvesting my own fish when the fish are allowed to return to the river.

Submitted by: Chad Pomelow

Community of Residence: WASILLA

Comment:

#14 - I support shutting down all trawler fishing in Alaskan waters. The destruction to the ocean floor will take generations to recover. The amount of by-catch is unsustainable. At some point there will be no fish remaining. How is it the trawlers are allowed such high numbers of by-catch and if an individual resident is fined for catching fish that have been determined to be at levels below the escapement for returns to spawning river?

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

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 a PWS salmon drift gill netter since 1987, and fished halibut in area 3A since 1978.

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,

Michael Poole

[REDACTED]

Homer, 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 in season 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

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 Juneau, Alaska, and I am tied to commercial, sport, and public use fishing. Hatcheries have supported my business for the last 18 years in PWS and SE. Without them, I would be out of business. Hatcheries have also provided many opportunities for my family to fill our freezer with delicious salmon and enjoy sport fishing. Proposal 78 would ruin my business at a time when the fishing industry is already facing tough times.

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,

Chad Poppe

A solid black rectangular box used to redact the signature of Chad Poppe.

Juneau, Alaska

November 26, 2024

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

Dear Members of the Board of Fisheries,

I live in Juneau, Alaska, and am tied to commercial, personal use, and sport fishing. Hatcheries have created an entire industry for multiple communities and supported countless livelihoods. These hatcheries are already struggling to return all their fish. Wild runs have been returning as expected, so decreasing egg take will not change that.

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:

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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,

Stacy Poppe

[REDACTED]

Juneau, Alaska

Submitted by: William S Powell

Community of Residence: Georgetown Texas

Comment:

I support the Chitna Dipnetters Assoc. goal which is to protect the rights of individual residents of Alaska to continue subsistence dip netting on the Chitina River.

Submitted by: Eric Predmore

Community of Residence: Eagle River

Comment:

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

These proposals aim to increase commercial fishing at the expense of personal use. This is anti Alaskan and we should be looking to support as much food self-reliance and resilience as possible in this state for residents.

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

These would protect or expand personal use rights.



November 26, 2024

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC opposes Proposal 78

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

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC employs 54 full-time staff members and approximately 75 seasonal workers with an annual operating budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. These taxes and cost recovery sales fish are derived solely from Area E permit holders and PWSAC operations. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors. Since inception, PWSAC has returned on average 70% of fish produced to common property fisheries.

PWSAC produced salmon contribute significantly to Prince William Sound fisheries and regional economies. Between 2012 and 2017 PWS commercial fishermen (all gear types) harvested a cumulative total of 539 million pounds of PWSAC-produced salmon worth \$296 million¹. The annual commercial harvest of PWSAC fish averaged 90 million pounds worth \$49 million.

During the same period (2012-2017), the first wholesale value to processors of products originating from PWSAC salmon totaled more than \$730 million, or an annual average of about \$122 million. Pink salmon were the largest component, contributing an annual average of more the \$70 million.

Nearly 40,000 PWSAC coho were harvested over the 2012-2017 period, equal to about 2,200 daily bag limits annually; 7,500 PWSAC sockeye were harvested as well, for more than 200 daily bag limits per year.

PWSAC's operation of the Gulkana Hatchery produced nearly two-in-five sockeye salmon between 2008 and 2017 in the personal use and subsistence harvest. Residents of more than 50 Alaska communities including Fairbanks, Anchorage, Matanuska-Susitna, and Copper River Valley harvested more than 325,000 PWSAC produced sockeye salmon.

¹ Economic Impact of the Prince William Sound Aquaculture Corporation (McDowell Group 2018)

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www.pwsac.com

PWSAC salmon production generates significant state and local taxes. Between 2012 and 2017, harvest of PWSAC salmon generated about \$10.6 million through the State of Alaska's Fisheries Business Tax. Half of this total is shared with communities where PWSAC salmon are landed (\$5.3 million) and the State retains the remainder. Cordova and Valdez receive most of these funds.

The cultural, social, and economic benefits of PWSAC produced salmon to all user groups have been realized for nearly 50 years. Proposal 78 imposing an arbitrary 25% reduction of PWSAC pink and chum salmon production would destabilize every benefit PWSAC provides, affect every user group, and alter harvest allocation. Historically, cost recovery revenue from pink and chum pay for the majority if not all the coho, Gulkana and Main Bay sockeye programs.

Proposal 78 –5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

Proposal 78 looks to reduce hatchery permitted eggtake levels of pink and chum by 25%. This proposal in similar form has asked the board to reduce hatchery eggtakes on at least five other occasions, all with the same unsubstantiated claims. Each time, the board has rejected the proposal that would dramatically affect fishermen's small businesses, families, as well as sport, subsistence, and personal use programs across large regions of Alaska. **The harm caused by passing this proposal is staggering, known, and quantifiable. There is no empirical or mechanistic evidence suggesting that reducing PWS hatchery production of pink and chum would lead to positive change for other species in or outside PWS.**

ACR 2 – Submitted by Virgil Umphenour at the October 2018 BOF Work Session sought to cap statewide private non-profit salmon hatchery egg take capacity at 75% of the level permitted in 2000 (5 AAC40.XXX). **Failed 2-5 (Public comment was 11 in favor and 116 opposed)**

Proposal 54 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish/Shellfish meeting sought to amend the PWS Management and Salmon Enhancement Allocation Plan to specify hatchery chum salmon production by reducing to 24% of year 2000 levels. **Failed 0-6 (Public comment was 5 in favor and 94 opposed)**

Proposal 55 – Submitted by Virgil Umphenour at the December 2021 PWS/Upper Copper/Upper Susitna Finfish meeting sought to amend private-non-profit hatchery permits to decrease allowable hatchery production to 75% of year 2000 levels. **N/A 6-0 (Public Comment was 4 in favor and 102 opposed)**

Proposal 43 – Submitted by Fairbanks Fish and Game Advisory Committee at the November 2023 Lower Cook Inlet Finfish meeting sought to amend the Cook Inlet Salmon Enhancement Allocation Plan and reduce hatchery production to 25% of the year 2000. **Failed 1-6 (Public comment was 6 in favor and 84 opposed)**

Proposal 59 – Submitted by Fairbanks Fish and Game Advisory Committee for the 2024 January Kodiak Finfish meeting. Reduce hatchery production to 25% of the year 2000 production. **Pulled due to lack of regulatory conformity.**

The suggestion that an ocean carrying capacity is being exacerbated by releases of Alaskan hatcheries into the North Pacific is not supported by Ruggerone and Irvine (2018) or the North Pacific Anadromous Fish

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Commission who provides the best available data on numbers and biomass of hatchery and natural origin adult (mature) and juvenile (immature) salmon. PWS pink production, for example, has been relatively stable since 1990, 30+ years. In estimates for the years 1990-2015, PWS adult and juvenile hatchery pink salmon biomass average <8% of the total pink salmon biomass in the North Pacific Ocean. When the adult and juvenile chum and sockeye salmon biomass are included for the same time, PWS adult and juvenile hatchery pink salmon biomass is estimated to average <2% of the annual total biomass for these three salmon species in the North Pacific Ocean. The vast majority of pink salmon in the ocean at any given time are of natural origin. When further compared to other pelagic fish (herring, pollock, cod, flatfish, squid) PWS hatchery pink biomass is estimated to average <0.03% of the total North Pacific Ocean food chain. Again, suggesting that reducing such an already small percentage of hatchery pink salmon in the North Pacific would have any positive effects for the proposer is not quantifiable and not substantiated in any scientific literature.

PWSAC continues to support constant scientific review and evaluation of the Alaska Salmon Hatchery Program and supports the current laws and regulations that guide it. PWSAC also supports the iterative process involving department staff, hatchery operators, stakeholders, and public. In the absence of compelling data or analysis supporting a reduction for conservation reasons, any significant changes need to be thoroughly examined by hatchery board members for hatchery needs and consider stakeholder input to ensure a well-informed decision.

Currently, the Alaskan seafood industry is in crisis due to increased production costs and global market uncertainties. This proposal would certainly have an additional negative impact on the viability of salmon processing operations in regions with pink and chum hatchery programs.

While annual returns are variable and dependent on ocean conditions, this proposal would likely result in total PWS ex vessel losses of \$10.8 million for pink salmon and \$3.6 million for chum annually. This is based on a ten-year average of years 2012-2024².

As mentioned above, this proposal would destabilize all PWSAC programs. PWSAC's Board of Directors would be forced to adjust the current operations and finances, including programs currently without a cost recovery mechanism that are paid for with pink and chum revenue. The Board may also need to consider altering strategic and necessary capital/infrastructure plans as well as plans and ability to retire debt including the enhancement revolving loan fund. Three of the five hatcheries PWSAC operates (CCH, MBH, and Gulkana) are State owned hatcheries. Lastly, years of lower ocean productivity and the resultant reduced marine survival and returns could significantly lower public benefit received from PWSAC.

Over the last 50 years Prince William Sound Aquaculture's programs have been an enormous success in helping rebuild Prince William Sound salmon stocks from the historic lows of the 1970s. Alaska's Salmon Hatchery Program has provided hundreds of millions of dollars in economic activity across the state since its inception and fed billions of people across our globe. The proposer has offered no empirical evidence to suggest harm by pink and chum hatchery programs, but it has been laid bare here the absolute harm that would knowingly be brought by the passing of Proposal 78.

It is important to note that hatchery associations, ADF&G staff, and BOF members have spent considerable time and money addressing these repeat proposals. Author and word changes have not brought any new or substantive information to the table. There is no supporting data that suggests these repeat proposals would help the intended stakeholders, but it is clear a proposal such as 78 would definitively harm many in the process.

²Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1&2)

PWSAC **opposes Proposal 78** and would respectfully ask that **the board reject Proposal 78, reject Proposal 156 scheduled for the Southeast and Yakutat Finfish meeting in 2025**, and reject any other request to reduce hatchery production that would destabilize the cultural, social, and economic benefits Alaska's salmon hatchery programs have provided all user groups for nearly 50 years. PWSAC has returned on average since inception 70% of fish produced to common property fisheries.

We look forward to working with Board of Fish members to answer any questions they have and help inform the public process during the meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Geoff Clark', with a stylized 'G' and 'C'.

Geoff Clark
General Manager/CEO

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www.pwsac.com



November 26, 2024

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC neutral on Proposal 79

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

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC employs 54 full-time staff members and approximately 75 seasonal workers with an annual operating budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. These taxes and cost recovery sales fish are derived solely from Area E permit holders and PWSAC operations. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors. Since inception, PWSAC has returned on average 70% of fish produced to common property fisheries.

Proposal 79 would close subsistence, sport, and commercial common property fisheries in the Main Bay Hatchery (MBH) Alternating Gear Zone (AGZ), Special Harvest Area (SHA), and Terminal Harvest Area (THA) until PWSAC cost recovery operations were complete for the year.

Any commercial fisheries in the Main Bay AGZ, SHA, and THA are opened and closed by emergency order based on recommendations from PWSAC. PWSAC recommendations are based on run entry to achieve broodstock and cost recovery goals.

Subsistence fishing at Main Bay parallels the commercial fishery in time and area except on Saturday when this fishery is open districtwide, including the SHA and AGZ outside a line of buoys 60-foot seaward of the barrier seine.

Sport fishing is open according to 5 AAC 55.023(10): sport fishing is prohibited from a vessel within 60 feet of the Main Bay Hatchery Barrier Seine; and (b) inside the Main Bay Hatchery barrier seine and shoreward to the head of the bay. Most if not all the sport fish effort occurs in the SHA and often the AGZ.

Within the MBH SHA, PWSAC utilizes a barrier seine to separate fish available for brood from cost recovery sales and/or common property fish. The barrier seine is designed to protect salmon intended as brood and to

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ensure orderly fishing outside the barrier seine by all user groups. The barrier seine is also designed to function as a tool allowing PWSAC to proportionally represent run-timing in fish available as brood stock.

Cost recovery fishing at Main Bay is conducted using a purse seine vessel with most of the fishing occurring in the AGZ near the hatchery barrier seine (Figure 1.) This is also where the majority of sport and subsistence fishing occurs and particularly on the weekends (Picture 1.). Congestion in this area has made it difficult if not impossible at times to conduct cost recovery fishing.

Cost recovery purse seine operators find most boats amenable to moving when a fishing set for PWSAC cost recovery is made. However, it only takes one boat to not move to halt all operations. There have been weekends where cost recovery processors have been unable to find a purse seine vessel willing to contend with the hassle and potential conflicts from the congestion of boats at MBH.

PWSAC's goal is to complete cost recovery revenue expeditiously and efficiently. Doing so allows all user groups to have access to PWSAC produced fish as soon as possible. Should PWSAC lose a weekend or two of fishing, this can prolong commercial restrictions as well as cost recovery conflicts.


Main Bay sockeye salmon run timing is in advance of other large sockeye salmon returns across the State. This can benefit PWSAC and commercial fisheries alike in terms of price per pound for MBH sockeye. On or around July 1st, the price PWSAC cost recovery or commercial fishermen receive for MBH sockeye can drop substantially.

The PWSAC Board establishes an annual corporate budget and corresponding revenue (cost recovery) goals by allocating production costs between the seine-caught and gillnet-caught salmon fisheries. This results in each gear group paying for enhanced production from which they benefit.

Traditional gillnet salmon fisheries available for cost recovery have been the Wally Noerenberg Hatchery (WNH) chum and MBH sockeye salmon. Until approximately 2021, the PWSAC Board primarily achieved gillnet revenue from the WNH chum and utilized MBH for cost recovery revenue only when the chum return appeared less than forecast. Since 2021, the PWSAC Board has found it prudent and necessary for PWSAC to achieve a portion of cost recovery from the MBH sockeye salmon program (Table 1).

PWSAC is eager to help the Board of Fish process any way we can. PWSAC operations benefit from orderly Main Bay fisheries that sustain this very popular and successful sockeye salmon program for the long-term well-being of all user groups.

Sincerely,



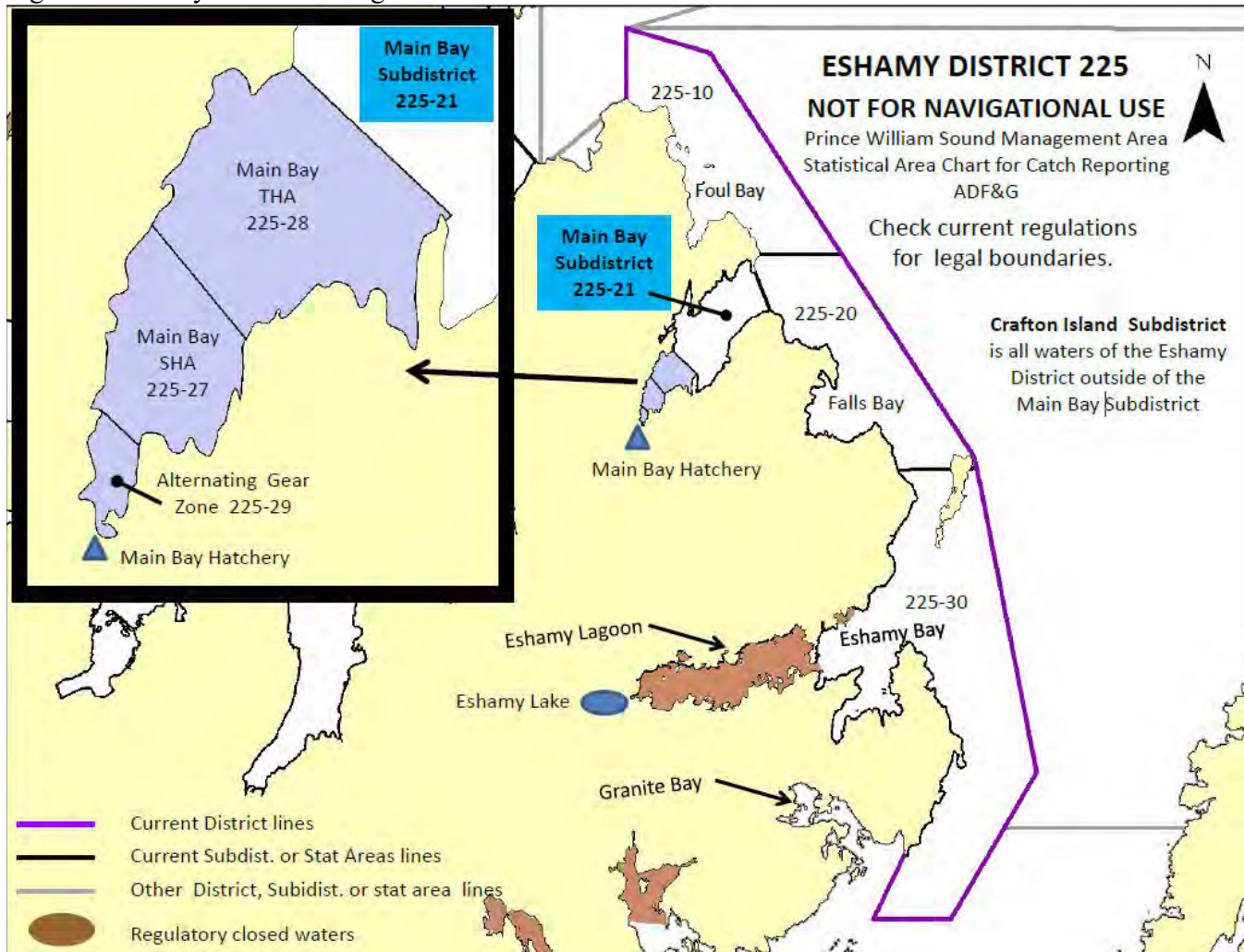
Geoff Clark
General Manager/CEO

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Figure 1. Eshamy District Management Areas



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Picture 1. Main Bay cost recovery with sport and subsistence fishing.



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Table 1. Main Bay Cost Recovery Years and Number of Fish

1995	64,123		
1996	58,793		
1997	236,031		
1998	111,026		
2000	218		
2001	50,458		
2002	93,794		
2003	366,768		
2005	188,904		
2006	350,742		
2007	321,095		
2009	133,560		
2015	180,516		
2019	6,527		
2020	236,982		
2021	241,328		
2022	125,923		
2023	226,956		
2024	405,334		

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November 26, 2024

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Submitted via online comment form and email: dfg.bof.comments@alaska.gov

RE: PWSAC neutral on Proposal 80

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

The Prince William Sound Aquaculture Corporation (PWSAC) is a regional nonprofit hatchery organization operating four salmon hatcheries in Prince William Sound (PWS) and one on the Gulkana River, raising all five species of Pacific salmon for harvest in subsistence, sport, personal use, and commercial fisheries. Founded in 1974, PWSAC was initiated by local fishermen to support the region's serious financial distress following several years of low salmon abundance. Today, PWSAC employs 54 full-time staff members and approximately 75 seasonal workers with an annual operating budget that exceeds \$14 million, funded by salmon enhancement taxes and cost recovery fish sales. These taxes and cost recovery sales fish are derived solely from Area E permit holders and PWSAC operations. PWSAC is governed by a diverse board of 45 members who represent over 800 commercial salmon fishing permit holders, and thousands more stakeholders who benefit from PWSAC production, including commercial fishermen, sport fishermen, subsistence fishermen, personal use fishermen, PWS municipalities, Alaska Native organizations, scientists, and salmon processors. Since inception, PWSAC has returned on average 70% of fish produced to common property fisheries.

Proposal 80 would close all sport fishing in Main Bay inside a line approximately 250 feet seaward of the Main Bay Hatchery (MBH) barrier seine until the MBH cost recovery and broodstock goals were met.

Any commercial fisheries in the Main Bay Alternating Gear Zone (AGZ), Special Harvest Area (SHA), and Terminal Harvest Area (THA) are opened and closed by emergency order based on recommendations from PWSAC. PWSAC recommendations are based on run entry to achieve broodstock and cost recovery goals.

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Sincerely,



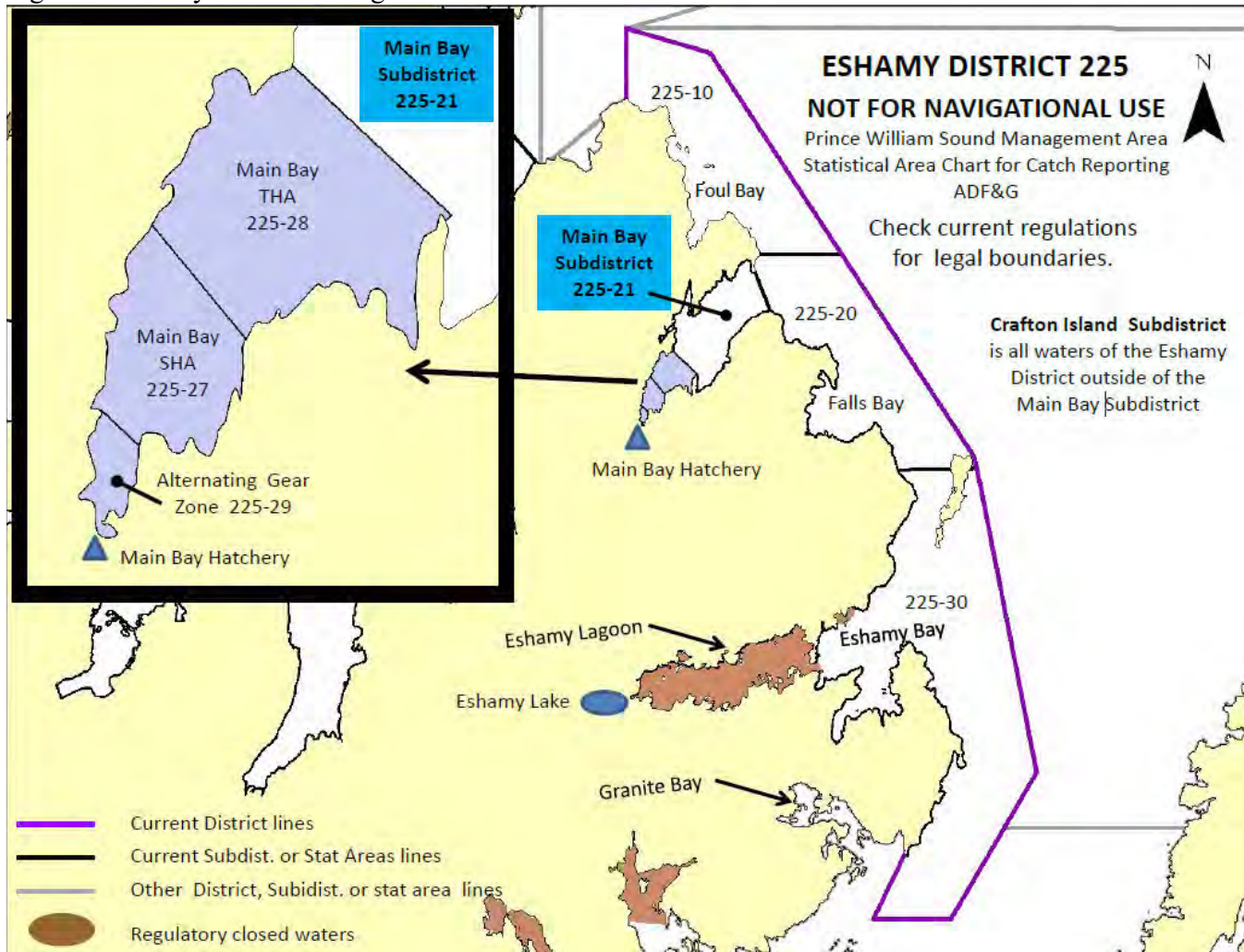
Geoff Clark
General Manager/CEO

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Figure 1. Eshamy District Management Areas



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Picture 1. Main Bay cost recovery with sport and subsistence fishing.



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Submitted by: Kristin Smith , Prince William Sound Economic Development District

Community of Residence: Cordova

Comment:

The PWSEDD opposes Proposal 78, please see attached letter with our position. Thank you for the opportunity to comment on these important decisions for our region.



November 25, 2024

Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries, ADFG
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chair Carlson-Van Dort,

On behalf of the Prince William Sound Economic Development District, I am writing to express our strong opposition to Proposal 78 made to the Board of Fish. Such a decision calls for careful scientific analysis, and note that Department of Fish & Game staff opposed a similar proposal in 2023, commenting:

Hatchery egg take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted in a way that minimizes impact on wild salmon stocks and the commissioner can amend a permit if conservation concerns arise related to hatchery production. If there is a compelling reason to amend terms of a hatchery permit, the amendment should be based on analysis of data and there should be clear evidence the amendment will have a positive impact on wild salmon stocks (ADF&G, Staff Comments, Lower Cook Inlet Finfish Board of Fish Meeting, 2023).

The drastic change in hatchery production proposed by Proposal 78 would adversely affect *all* the fisheries of Prince William Sound: subsistence, sport, seine, drift gillnet and personal use.

Even those without direct ties to seafood benefit from hatcheries as drivers of economic opportunity. Recent analysis by McKinley Research Group highlights the impacts that hatcheries have on economic outcomes throughout Alaska. Each year, Alaskan hatcheries account for roughly 4,200 jobs, \$219 million in labor income, and a total of \$576 million in economic output (MRG 2024). In Prince William Sound alone, hatcheries generate roughly 2,200 jobs, \$104 million in labor income, and a total economic output of \$315 million each year. Hatcheries drive economic impacts far beyond direct labor and income by benefiting thousands of fishermen, processing employees, and hatchery workers, not to mention thousands more support sector workers, and even sportfish charter operators and guides, who likely rely on hatchery production for some portion of their income.

It's hard to overstate the far-reaching impacts of Alaska's hatcheries, especially when it comes to additional tax revenue. Hatcheries and the fish they produce generate local revenue through taxes on raw fish, property, and sales paid by commercial and charter fishermen, seafood

processors, hatchery associations, and support sector businesses and employees. These tax revenues help Alaskan communities to survive in the challenging years and thrive in the good years across the state.

More directly, hatchery-produced salmon contribute to the State of Alaska Fisheries Business Tax, which ranges from three percent to five percent and is levied on ex-vessel values of harvested hatchery salmon. The revenue from this tax is split evenly between the state and the community where the salmon are landed. Thanks to enhancement taxes paid by commercial fishermen and cost recovery activities, Alaska's nonprofit hatcheries are self-sufficient financially, ensuring that they contribute much more to the state's economy than they pull out of it.

Because Prince William Sound salmon hatcheries are a resource that benefit all fishing user groups, generate revenue for the State and for our fishing communities, and are one of our region's bigger employers, we oppose the approach put forward in Amendment 78 and urge the Board of Fish not to adopt this proposal.

Thank you for your consideration,



Kristin Smith
Executive Director



Madam Chair and Members of the Board,

Thank you for the opportunity to comment prior to the upcoming 2024 Board of Fish Meeting in Cordova. My name is Forest Jenkins and I currently live in Homer, Alaska. I am the current Prince William Sound Setnetters' Association President. I hold the setnet seat on the CDFU Board and have participated on the PWSAC Board for multiple years. I have been participating in the Eshamy District setnet fishery since 2008. In addition, I also am an active permit holder in the Prince William Sound commercial drift gillnet and shrimp fisheries.

Proposals 46 and 47- SUPPORT

We fully support Proposals 46 and 47 that both promote in season reporting in the subsistence and personal use fisheries. Accurate and timely reporting is essential to provide the tools for management to properly monitor our wild salmon populations. 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, 52, 53 - OPPOSE

We strongly oppose Proposals 51, 52, and 53 that all aim to undermine ADFG's ability to manage this fishery by taking away essential tools for adaptively managing our salmon stocks in the Copper River. Run timing can vary greatly from year to year and the concrete management strategy of these proposals present serious risks to our future salmon returns and the livelihoods of those that depend on this resource. Taking away the tools from local area biologists that have the most knowledge about the resource is irresponsible and hopeless. Our ADFG biologists already have the ability to restrict commercial effort early in the season and have proven to use these actions when necessary.

Proposal 55-SUPPORT

We support this proposal with the goal of simply sharing the burden of conservation across all user groups throughout the waters of the Copper River. If commercial opportunity is restricted in the lower part of the system to protect kings, management should be consistent to responsibly restrict upriver commercial effort and protect these same kings. It is illogical to allow kings to pass lower commercial effort only to allow them to be harvested upriver.

Proposal 56 and 57-OPPOSE

As currently written, we oppose proposals 56 and 57 that aim to allow drift permit stacking in Area E. Both proposals offer options to stack two permits on one vessel in order to fish 200 fathoms of drift gillnet gear if one permit holder holds two S03E permits or if two permit holders are on board. We are aware of the current economics of this fishery that raise concerns for members of the drift gillnet fleet. With extremely low permit values and potentially too many vessels in the fleet for the current state of this fishery, it is becoming more difficult for permit holders to make a living solely in the drift fishery.

A statewide buyback concept is much more appealing for us to remove permits and gear from the water and increase the economic viability for all remaining drift gillnet permit holders in Area E. We also understand this is a long uphill battle and a fleet driven consolidation has potential to be achieved much more efficiently. We could potentially support this proposal with a couple necessary edits that would accomplish the authors' goals, while also avoiding allocation and gear conflict issues.

As written, these proposals raise many concerns surrounding allocation, gear conflict, and fleet monopolization. The eventual goal of these proposals is to remove gear from the water and make this fishery more economically viable for the drift fleet that remains. Initially, the latent permits would be sold and an additional 50 fathoms of gear would be in the hands of the most competitive fishermen in the fleet. This will have significant effects on the harvest levels of single permit drift vessels fishing behind a larger aggregate of gear. We have heard drift gillnet permit holders with no interest in purchasing a second permit voice their concerns of fishing a 150 fathom net behind a 200 fathom net.

We also have to remember that these proposals would have significant effects on the Eshamy District, one of the smallest fishing districts in the state where both drift and setnet permit holders share the resource. The efficiency on the lines in the district would increase significantly, reducing the harvests in the remainder of the district. These proposals would also create a lot more chaos in highly competitive terminal harvest areas. Yes, there could be less boats in the fishery, but the same number of boats will pack into the build up areas, only now they will have 200 fathoms of gear to deploy. We also foresee more gear conflict with this proposed change as it will result in more challenges to manage a 200 fathom net and avoid wrapping setnet gear in the Eshamy District. It is already hard enough to manage a 150 fathom net in weather and strong current, and successfully avoid setnet gear along with other obstacles.

Under the Main Bay Hatchery Terminal Harvest Plan, the setnet fleet gave up gear length inside the THA in Main Bay to accommodate the drift fleet. Setnet permit holders can only fish up to 50 fathom lengths of gear in the THA. Allowing 200 fathom drift nets inside the small area of the THA would be allocative and create more chaos in the congested, highly competitive Terminal Harvest Area.

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 allocation and 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.

To address our concerns, we suggest two changes to Proposals 56 and 57. First, in order to protect this fishery for future entrants, we propose that two permit holders must be on board the dual permit vessel and a single participant cannot hold and operate two drift permits at a time. This way, the fishery will remain accessible to new entrants and may even encourage new entrants to join the fishery by gradually investing into the fishery until they are completely ready to be independent and own their own vessel. Second, these proposals should exclude the Eshamy District to avoid, gear conflict, congestion, and allocation concerns. Some may say this will raise enforcement issues, but this alteration should not add any additional concern, as gear will have to be shackled to remove gear when the second permit holder is not on board. Also, all vessels operating dual permits will have to display the D on the side of the vessel. These proposals will most benefit the fleet and have fewer potential negative consequences in the chum fisheries and on the Copper River flats, further supporting our request to change these proposals to exclude the Eshamy District if in fact the drift fleet is in support of the permit stacking avenue of fleet consolidation.

We do think it would have been good to have a fleet wide poll to see if these proposals are supported by the greater majority of the permit holders. It is hard to support any drastic consolidation proposals like these without a full survey of the fleet.

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**

We oppose these allocative proposals that intend to change the allocation plan that has been working to maintain a long-term historic balance between competing commercial users since its inception. Removing the 5 year averages is not logical, as 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

We 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

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.

Proposal 80-SUPPORT

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.

Proposal 81-SUPPORT

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.

Proposal 83-OPPOSE

Proposal 84-SUPPORT

Proposal 85-OPPOSE

Proposals 86-88-SUPPORT

Submitted by: Jacob Privat

Community of Residence: Homer

Comment:

Proposal #

50. Support. The use of chart plotters and fish finders would allow for unfair capture of holed up and resting/spawning salmon.

78. Oppose. Current local marine mammal stocks would need to increase their wild stock catch proportionally if enhanced stock egg take was reduced; amongst other ecological and economic factors.

Submitted by: Bruce Privett

Community of Residence: Wasilla

Comment:

My comments relate to both proposals 73 and 74. As a PWS seine permit holder and active boat owner/fisherman , I've experienced the effects of permit stacking first hand. Although I have no intention of acquiring or using a second permit , I feel that the permit stacking has had a good result for all concerned. It reduces the number of vessels and it reduces total gear in the fishery. As it stands presently, the boat needs two different permit holders to operate two permits and I think there is no real benefit to that arrangement, whereas it does cause unnecessary complications to the vessel owner. I am in favor of allowing one person to operate two seine permits on one vessel . Thank you

Submitted by: Bruce Privett

Community of Residence: Wasilla

Comment:

This comment is directed at proposal 77.

I oppose this proposal. As a PWS seine permit owner and active fisherman, my understanding about the allocation plan is that VFDA hatchery is not included in the management plan because the Copper River Flats fishery valuation is also excluded from the plan . If you want to include the VFDA pinks in the plan you need to add the Copper River Fishery into it as well. Area E includes all of PWS and Copper River. The Port Chalmers chum fishery goes back and forth between the two gear groups as an equalizer. Thank you

Submitted by: Bruce Privett

Community of Residence: Wasilla

Comment:

This comment is directed at proposal 78. I oppose this proposal. While this proposal resurfaces annually in varying forms , it continues to lack merit. Hatchery enhanced pink salmon account for only 2.1 percent of the major salmon stocks present in the North Pacific between 1990 and 2015 according to the study presented to the Alaska Legislature by Dr. Katie Howard, Fisheries Scientist , to the House Fisheries Committee on February 6, 2024. To suggest that King Salmon decline in certain areas is a result of this small fraction of the salmon biomass competing with them is rather outlandish.

ADF&G Biologists have not drawn a cause and effect connection between hatchery pink salmon production and king salmon decline as far as I know. . As this perennial proposal continues to lack any evidence of its claims, I suggest they bring it back in five years if any solid proof is forthcoming at that time. Please reject this proposal once again . Thank you .

Submitted by: Bruce Privett

Community of Residence: Wasilla

Comment:

My comments are directed at proposals 75 and 76. I oppose these proposals. As a PWS seiner , I don't want reduced opportunity to seine in the sound. As it is, we have no opportunity to harvest Esther Hatchery bound chum salmon in the greater area before July 20th while chums build up at the hatchery and go dark and become valueless in front of the hatchery. That reduces the value of what the gillnetters would catch in the allocation plan . Seiners have very little access to the chum salmon and further cutting us off is not justified. Value is being wasted and additional seine opportunities could solve that . Thank you

Submitted by: Johnny Provost

Community of Residence: Seward

Comment:

I support maintaining access to the Chitina Dipnet fishery and having charter boat access available. I do not own a boat and having charter boat access to this fishery is important for me and my family. Without access to this fishery and the charter boat access I simply would not be able to physically dipnet.

Board of Fisheries –

Thank you for allowing me to provide my public comments regarding the Prince William Sound and Upper Copper/Upper Susitna Finfish proposals. I reside in Palmer, AK and fish the personal use fishery on the copper river every year. Our family of (7) has enjoyed the opportunity that has existed to fill our freezer with copper river salmon. Our family does not participate in any other personal use fisheries or subsistence fisheries. In addition, we recreate in the Lake Louise and Denali Highway areas throughout the year, primarily ice fishing.

I have provided support for or against proposals that may directly impact our family and have avoided providing comments (or support for/against) on any proposals that I am not knowledgeable on.

I began fishing in the Copper River Personal Use Fishery in my teens when my parents allowed me to go by myself. This was in the early 2000's and we shore fished. Since then I have occasionally fished from a boat, but have primarily shore fished. Since that time, the rise in commercial operators guiding within Copper River Personal Use Fishery has expanded to a point where it is causing more tension among user groups (shore fishing, boat fishing, commercial, local subsistence users, etc.) that something should be done to sustainably manage the fishery. While I am a supporter of resident personal use/subsistence fishing above all other interests, I don't believe these fisheries that fill residents freezers should be exploited for profit. In addition, I believe a significant number of the issues raised in the provided proposals would be settled by eliminating guided fishing within the personal use fishery. In addition, I believe eliminating transport within the subsistence fishery (as guiding has already been removed) would also help. I believe transport within the personal use fishery should still be allowed. The transporters that drop residents on East Bank of the personal use fishery helps spread out resident fishing parties and opens up more fishing locations/opportunities.

The increase in guided fishing pressure within the Personal Use Fishery can't be argued. As detailed in Proposal 70, the Chitna Dipnetters Association would like to extend the Southern bounds of the fishery to allow for more areas to fish. This is directly from their proposal "In the last 12 years, directed dipnetting from both personal and guided boats has substantially increased as a method of harvesting salmon in the Chitna Personal Use Dipnet Fishery (CPUDF)." The majority of the boats fishing at the southern end of the fishery are guided users, the proposal includes "personal boats" but in reality the majority of these boats are guided users.

I believe the Board of Fisheries (BOF) should consider the following;

Proposal 49 – Support removing transport services within the Subsistence Use Fishery.

Proposal 71 – Modify to allow for the transport of personal use fishery participants and support the prohibition of guiding within the Personal Use Fishery.

I believe with your support on these (2) proposals, a number of the conflicts raised within this meeting would be mitigated.

I have provided comments and/or support for the other proposals I feel that I am qualified to do so on below.

Proposal 14 – Support

Proposal 16 – Support

Proposal 17 – If proposals 14 or 16 are not passed, I believe 17 should be an absolute requirement based on the Chinook Bycatch that occurred this fall in Kodiak.

Proposal 47 – Do Not Support – The idea behind this proposal would be that it allows the department to close the fishery via EO based on “real / me data.” I don’t believe this will provide the outcome it is intended for and in addition, many participants within the fishery would be FTR’d (failure to report) if they don’t report within 5 days. This would eliminate them from participating in the fishery the following year. This would put an unnecessary burden on the users and potentially eliminate them from participating. In addition, with the removal of guided fishing in the personal use fishery, the overall take would decrease.

Proposal 48 – Do Not Support

Proposal 49 – Support, see previous comments.

Proposal 50 – Do Not Support, with the removal of guided fishing in the personal use fishery, this item would be moot. In addition, for boat safety, depth finders and travel paths should be allowed for. This would also be very difficult for agency enforcement.

Proposal 55 – N/A if proposal 49 is accepted, if proposal 49 is not accepted, Support. I believe 49 would be a better proposal for acceptance.

Proposal 58 – Support, this allows the department greater flexibility in management and allows more resident opportunity.

Proposal 59 - Support, this allows the department greater flexibility in management and allows more resident opportunity.

Proposal 60 – Do Not Support, this takes away resident opportunity and if Proposal 49/71 are accepted as previously noted, this concern would most likely be eliminated as the overall take would be reduced from guided operators.

Proposal 61 - Do Not Support, this takes away resident opportunity and if Proposal 49/71 are accepted as previously noted, this concern would most likely be eliminated as the overall take would be reduced from guided operators.

Proposal 62 – Do Not Support

Proposal 63 – Do Not Support, historically we have fished the early season (June 10th to June 15th) and the runs have been great. The board should not completely adjust the management plan start dates because we have had a couple of cold springs. This does not support resident fishing opportunity during one of the best times to fish.

Proposal 64 – Do Not Support

Proposal 65 – Do Not Support, similar comments as provided in proposal 47.

Proposal 66 – Do Not Support, this would restrict resident fishing opportunity and would be difficult to manage without severely restricting resident opportunity.

Proposal 67 – Do Not Support, while I believe that keeping salmon in the water is a better outcome, it is often not practical when standing on the side of the Copper River Canyon / ed off to a rope. This would create a safety concern and would be difficult to enforce. The salmon is often tangled in the net and requires the participant to untangle the fish to allow it to be released in the safest means possible.

Proposal 68 – Do Not Support, with the acceptance of Proposal 71 (as modified) this concern would be mitigated.

Proposal 69 – Do Not Support, with the acceptance of Proposal 71 (as modified) this concern would be mitigated.

Proposal 70 – Do Not Support, with the acceptance of Proposal 71 (as modified) this concern would be mitigated.

Proposal 71 – Support as modified (see earlier comments).

Proposal 72 – Do Not Support

Proposal 89 – Support

Proposal 90 – Support

Proposal 91 – Support

Proposal 92 – Support

Mark Psenak



PSVOA

PURSE SEINE VESSEL OWNERS' ASSOCIATION

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

November 22, 2024

SUBMITTED ELECTRONICALLY

Alaska Board of Fisheries
P.O. Box 115826
Juneau, AK 99811

Re: Oppose Proposal 78

Dear Board of Fisheries Members:

The Purse Seine Vessel Owners Association ("PSVOA") respectfully submits the following comments in **strong opposition** to Proposal 78, which is before the Board at the upcoming Prince William Sound finfish meeting in Cordova. PSVOA is a commercial fishing organization having members that participate in the salmon purse seine fishery in Prince William Sound.

PSVOA strongly opposes this anti-hatchery proposal. Proposal 78 is nearly identical to other proposals recently brought forward by anti-hatchery groups and individuals which the Board has consistently rejected. In permitting hatchery operations, the Alaska Department of Fish and Game (ADF&G) already considers many of the concerns raised in this proposal, including the need to minimize interactions between hatchery origin and wild salmon and the need to ensure harvest practices targeting hatchery produced salmon do not negatively impact wild fish.

The Alaska Hatchery Research Project is an ongoing research project designed to investigate the question of whether straying of hatchery origin salmon adversely impacts wild salmon stocks, and to what degree. At the conclusion of the study, the results will be published and peer reviewed. The results and conclusions derived from the study will provide ADF&G with an objective assessment of wild/hatchery salmon interactions. Any action taken by the Board to require reductions in hatchery production at the present time would be premature and not based on best available science. Indeed, there is no science supporting the proposed 25% production. Such a number is completely arbitrary. Moreover, if adopted, the proposed hatchery production cuts would have a significant negative economic impact on the commercial salmon industry as well as salmon-dependent communities that rely on fisheries tax revenues to fund essential public services.

November 22, 2024

Page 2

In sum, PSVOA respectfully requests the Board **reject** Proposal 78. Thank you for your consideration of PSVOA's comments regarding this misguided proposal.

Very truly yours,

Robert Kehoe

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

Submitted by: Clifford Raines

Community of Residence: Fairbanks

Comment:

We oppose proposal numbers 44, 45,46, 47,49, 50, 54, 55,56, 57, 60, 61,62, 63,64, 65,66, 67,68, 69,71 and 72.

We support 48, 5859 and 70.

AK expeditions does an extremely important job in providing charters for those of us who cannot access the steep hillside of the Copper River for safety sakes, and providing our families with the sustenance we get from the Copper River sockeye salmon in Chitina. We depend on being able to dip net to sustain us. We prayerfully ask that AK expeditions be granted the ability to continue to offer this service for their customers with the charters they offer.

Submitted by: Kelly Ranchoff

Community of Residence: Fairbanks

Comment:

I'm writing in support of and opposition to numerous proposals as a lifelong Alaskan that was raised in a household that followed a humble traditional subsistence lifestyle and continues to even now. Access to the abundant personal use fisheries and hunting opportunities allowed my family to put healthy food on the table even through the lean years, we could count on having a full freezer and being able to have some extra abundance around to help those less fortunate that year to feed their families. I don't believe in restrictions to our access to any of these resources under the false guise of conservation concerns when the reality is a much darker history of user group conflicts and special interests that are more interested in selling you your next meal. Supporting the end user fisheries and families of Alaska should come first.

At a time of sustainable fisheries; I support proposals 48,58,59, and 70.

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

Submitted by: Thomas Ranchoff

Community of Residence: Fairbanks

Comment:

Proposal # 63,64,65

I oppose all three. These fisheries are very strong. I have been fishing chitna, kenai and kasilof for more than 30 consecutive years and have raised my family on the salmon. These proposals are an attempt by special interest to limit access to the states fish resources. Unjustified and self serving. Thank you.

Submitted by: Thomas Ranchoff

Community of Residence: Fairbanks

Comment:

I commented on three proposals earlier. I since had the chance to review further proposals. I have fished multiple personal use fisheries for over thirty years. I feed my family on Alaskan salmon. My children continue feeding their families on Alaskan salmon. These proposals are a travesty to Alaska and Alaskan way of life. It is attempt by a user group to game total access to a resource that is for all. Sad that politicians and lobbyists have taken control. These fisheries build both strong families and strong family ties. These proposal directly jeopardizes what are the core values to Alaskan families.

Submitted by: Jack Reakoff

Community of Residence: Wiseman Village Alaska

Comment:

Support Pinks have alternating years but hatcheries do not reduce release on the even number low cycle years. Coho have biannual highs that are a result of pink abundance. First year Chinook smolt are highly affected by pink smolt abundance.

Hatchery releases in Prince William Sound are the highest in Alaska. The pink releases have escalated far beyond the capacity of the North Pacific Gulf of Alaska since 1974 when the hatchery programs were established. Marine crashes due to excessive temperatures stress many fish stocks, but especially salmon, Chinook, Coho, and Chum in particular. NOAA has marine trophic productivity survey data documentation.

2024 returns were so low the hatcheries were having a hard time getting enough egg recoveries. Chinook, Coho and Chum stocks are in crisis in AYK. Especially the Yukon.

Proposal 78, in my opinion is a minimum step to arrest the problem. This proposal is the first baby step to save wild stocks and even the hatcheries from them selves.

Hello name is Brian Reishus. I'm born and raised here in Alaska. I'm an avid hunter and fisherman and a registered guide with the state of Alaska. Over the years I been searching for the perfect area to Ice fish. After years of searching, I found a place called Lake Louise. I currently live on the lake and fish approximately over 60 plus days there.

I am OPPOSED to increasing the limit on Lake Louise to 2 Burbot. Here's several reasons why

1. Location next to the road system increases the amount of sportfisherman. There's a reason why Lake Louise has been a limit of one Burbot for many years.
2. Overfishing of Burbot. There has already been a crash of burbot population in the 1980's why would we risk this again. Unless there's two studies of population no one knows if it has gone up or down recently.
3. Log books or reporting isn't required for guides or sportfisherman for burbot so there's no way to indicate the harvestable surplus of Burbot until its too late.
4. Overfishing by the guides and sportfisherman on burbot spawn locations using cameras and new technology like the Garmin Panoptix. These new technologies are now used by almost everyone fishing in the summer and winter. There's no more fisherman sitting on a bucket cold. They have tvs, heaters, and 4k cameras and directional sonars that locate the burbot spawn locations.
5. Social Media in the last 5 years have led fisherman to exact spots to where guides and burbot holes are located on all the lakes. Some guides have thousands of followers just for Lake Louise. This has significantly increased the pressure.
6. Being a guide I have been told by other guides if there is a limit of two for burbot the bookings would increase, and they could take an infinite number of people because of Lake Louise being located on the road system. This would allow guides to take big groups of people that couldn't travel as far as lake Susitna and Crosswind Lake.
7. In the last few years there has been an increase in hard side huts all placed on burbot holes and then are commercially rented. There is now a facebook group that is primarily for renting these shacks with bait provided. The number of shacks has doubled every year for the last three.
8. People do not rely on burbot on this lake for subsistence especially if there's no more caribou harvesting in the area. So why increase this limit.
9. Bait snatching, trading, and commercial sales of whitefish and not being taken into account on ADFG studies. I have been asked myself if I needed bait from a net that is located on Lake Louise every year. That net is there for Subsistence harvesting and I know none of those fish are being eaten by humans.
10. Not enough enforcement on the lake. Often times I cruise around to find people still using set lines and unattended lines. These often have dead burbot or burbot with a hook down in their stomach.
11. Although ADFG's study of burbot indicated higher numbers of burbot there isn't a requirement for freshwater logbooks for guides or sportfisherman that would make it clear how many burbot are being harvested.

In conclusion I strongly oppose increasing the limit of Burbot to 2. In short, there's lots of debatable factors that one study conducted every decade isn't taking into consideration. I have lived in this state my entire life and over the last ten years have seen multiple big game and fish populations

managed by ADFG trend lower. I want future generations to have the chance to be able to fish. Please do not pass this new proposal as it will have a detrimental impact on the burbot populations on a road system lake like Lake Louise.

Here are some photos of the destruction of Lake Louise









11/26/2024

Reference Material
for John Renner personal
Testimony / Thank you

Bounties: Harbor Seals and Eagles

Prior to Statehood in 1959, Alaska controlled the harbor seal and eagle populations and actually had a bounty on them. When I was a child there was a \$6.00 bounty on harbor seals, you skinned out the face, and \$2.00 for cutting off the feet on bald eagles. The bounties were paid by the State.

During 1951-1958, a dynamite bombing control program was conducted on the Copper River Delta in response to serious seal depredation problems on the salmon gillnet fishery. A reported 30,250 seals were killed during this program which reduced the seal numbers to low levels. Jim Nichols (owner of the Alaska Bar & Hotel) and Harold Z. Hansen (secretary for the Cordova Aquatic Marketing Association) had the contract with the State of Alaska to kill harbor seals every spring before the commencement of the Copper River gillnet fishery.

Harold and Jim used open, flat bottom skiffs with outboard motors that were fast enough to usually get out of way of the 25 lb. dynamite charges they would throw off the transom. If they hid a sand bar after throwing the live charge, the outcome could be quite different.

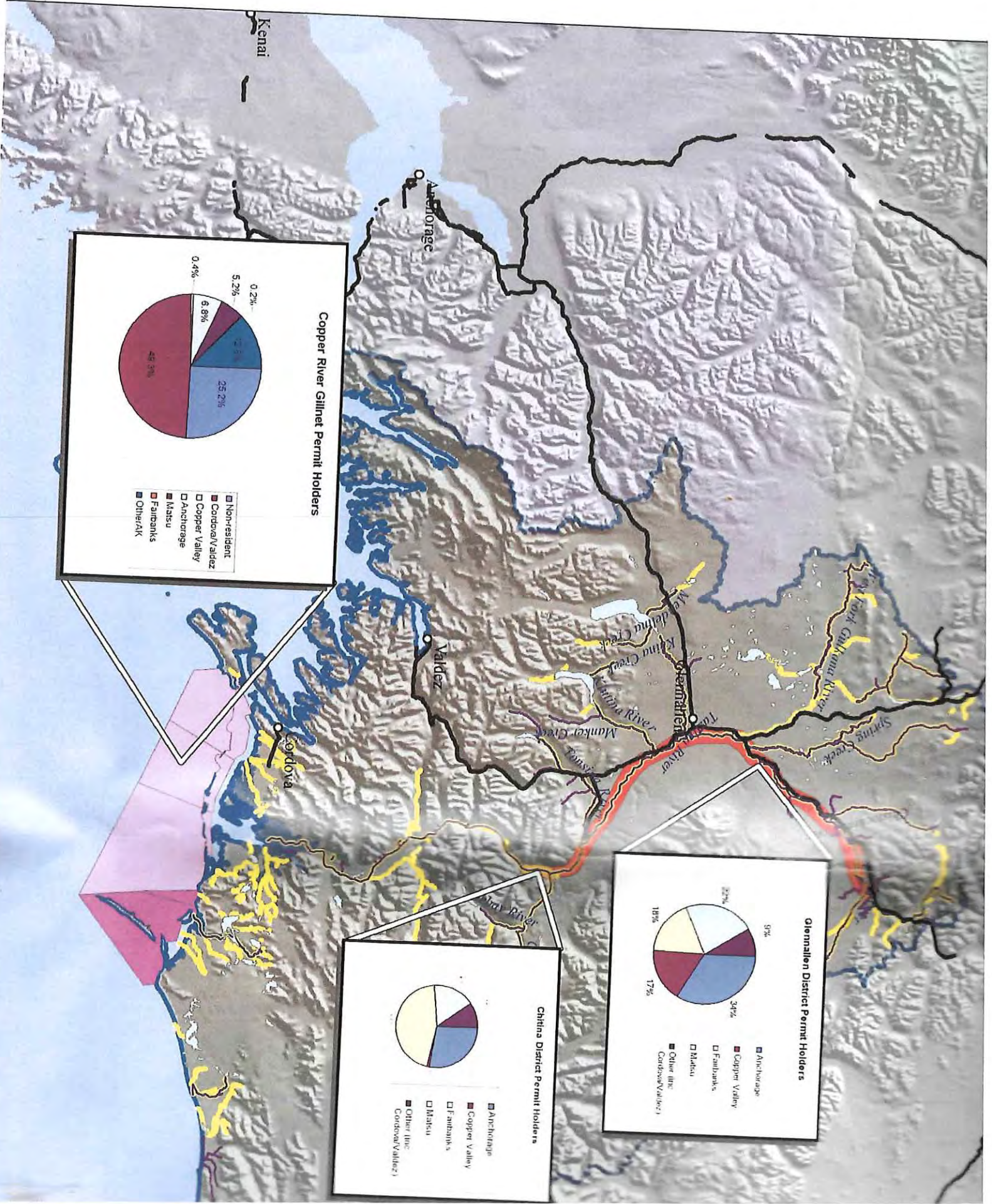
They would hunt the seals up the Copper River, looking for where they were hauled out in large numbers. Then they would run fast and loud near the sand bar, driving the seals into the water. The adult seals would submerge and depth charges were thrown off the skiff, to sink and kill the seals by the concussion. The pups, being too young to dive, were hunted down and shot with shotguns.

Kenneth W. Pitcher, an ADF&G biologist out of the Anchorage office reported "in 1977, nearly 18 years after cessation of control activities (dynamite), fishermen are again experiencing significant depredation problems indicating considerable recovery of the population."

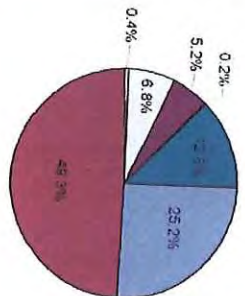
From 1927 until 1967, a bounty was paid on harbor seals in southern Alaska (the Copper River Flats and Prince William Sound were included). However, during the 1960's a commercial industry developed utilizing harbor seal skins. Initially, high prices stimulated a peak harvest of over 50,000 seals in 1965. After that, prices dropped and the harvest stabilized at about 10,000 animals annually until the passage of the Marine Mammals Protection Act of 1972, when all harvest except for native subsistence ceased. There has been no effort to control the population. I don't see the reasoning behind enacting the Marine Mammals Protection Act with regard to the harbor seal issue. After the price of skins dropped and the harvest went from 50,000 animals to 10,000, a balance would have been found on its own. During the dynamite years 30,000+ seals had been taken on the Copper River and my 1977 Ken Pitcher with the ADF&G stated the harbor seal population was again becoming a serious problem for the gillnet fleet.

Unlike some areas of the State, PWS and the Copper River Delta didn't receive continuous, intensive hunting pressure during the mid-1960's. Hunting effort was related to activities in the fishing industry. Most seal hunting was conducted by fishermen during the closed fishing seasons. The peak harvest in the PWS/Copper River District took place in 1963-64 with a take of about 2,500 animals. Remember, Harold and Jim killed over 30,000 between 1951 and 1958, and ADF&G biologist Ken Pitcher stated in 1977 that the harbor seal population was having an adverse effect on the gillnet fishery. That was 44 years ago! Nothing has been done to attempt to control the harbor seal population in 49 years!



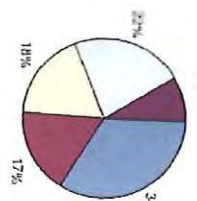


Copper River Gillnet Permit Holders



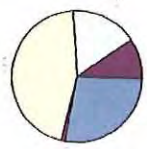
- Non-resident
- Cordova/Valdez
- Copper Valley
- Anchorage
- Matsuk
- Fairbanks
- Other/NA

Olenak District Permit Holders

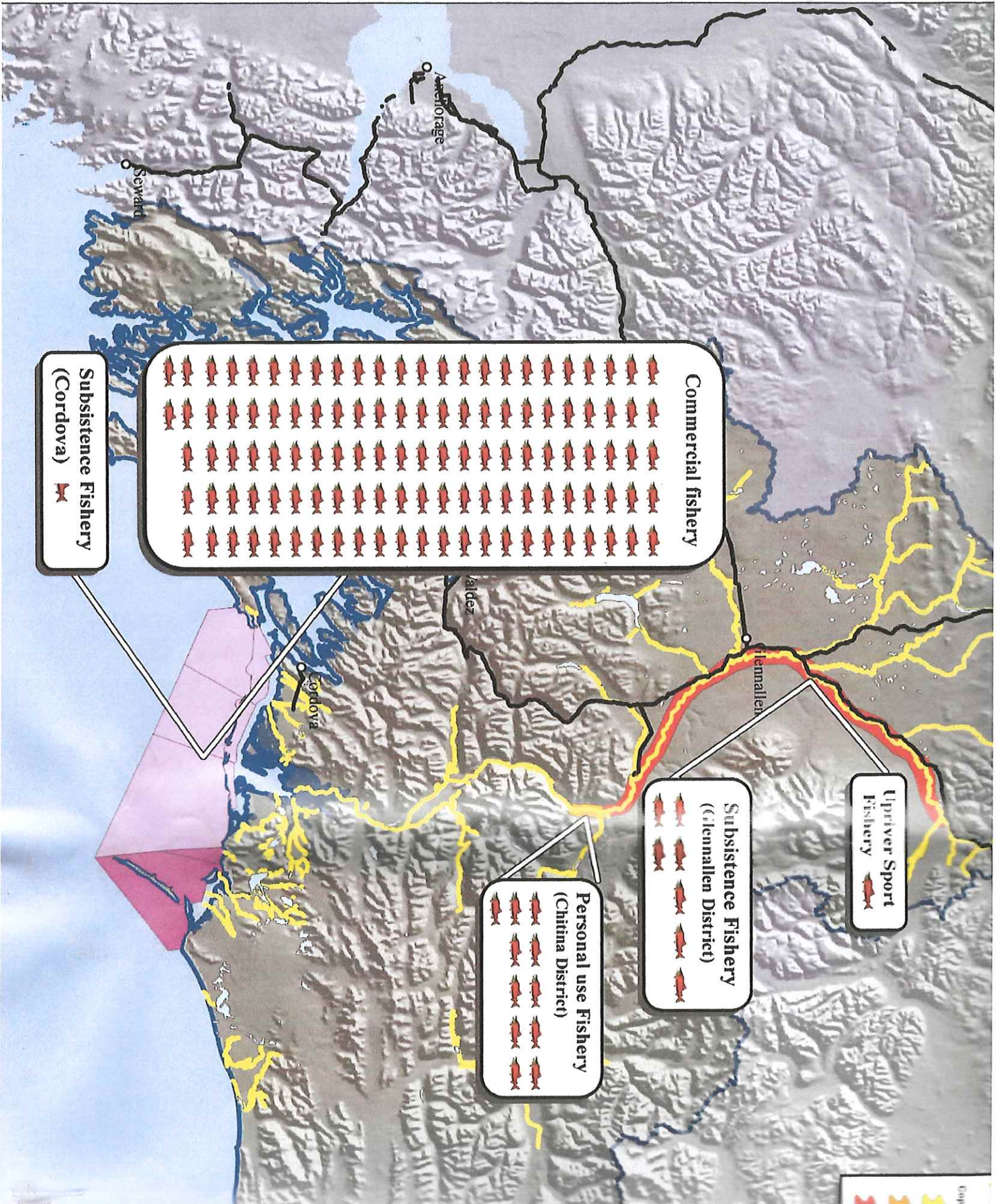


- Anchorage
- Copper Valley
- Fairbanks
- Matsuk
- Other (the Cordova/Valdez)

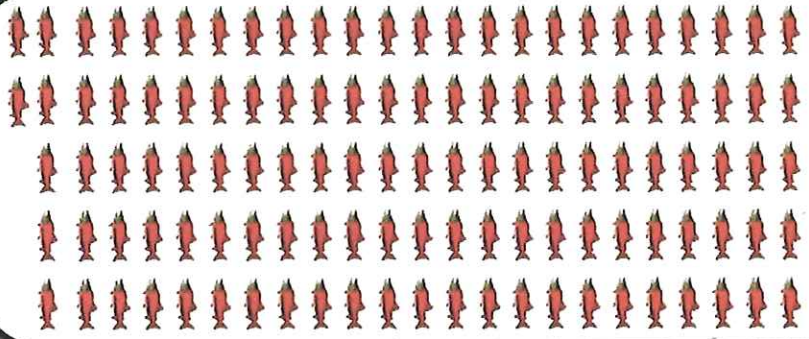
Chitina District Permit Holders



- Anchorage
- Copper Valley
- Fairbanks
- Matsuk
- Other (the Cordova/Valdez)



Commercial fishery



Subsistence Fishery
(Cordova)



Upriver Sport
Fishery



Subsistence Fishery
(Chennallen District)



Personal use Fishery
(Chitina District)



Submitted by: Kenneth Renner

Community of Residence: Cordova

Comment:

I oppose proposals 51,52, and 53

There is no evidence of Stock diversity and biodiversity issues being documented on the Copper River. There is a substantial amount of overlap between all the different stocks in the copper for run timing. These proposals aim to further reduce fishing time when we have already seen a substantial reduction in time and area. This proposed two-week closure is during some of the peak prices of the season. As a direct marketer, I make the majority of my income during these weeks because it is still the first fresh fish on the market. I support my Alaskan native family who resides in Cordova year-round with this income. More lost fishing time and area will hurt us financially. These proposals are taking tools away from the managers without the science and data to back it up. Please oppose proposals #51,52, and 53.

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 fisherman in Area E as well as a salmon seiner in Prince William Sound. I live in Cordova, Alaska and I make my livelihood from the hatcheries. They produce fish for us to harvest. A 25% decrease would devastate us.

Taking away 25% of the egg take could financially ruin many fishermen. As prices across the board increased we would not be able to afford to fish or live in Alaska. There has been no studies that show a negative impact to the ocean so therefore why change what is working.

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,

Raymond Renner
ray_renner4@hotmail.com
Cordova, Alaska

Submitted by: Alexander Reutov

Community of Residence: Mat-Su Borough

Comment:

I think it is unconstitutional to take our rights away to fish

Submitted by: Anatoly Reutov

Community of Residence: Sterling alaska

Comment:

Oppose 5-7 51-52-53 support 76

Submitted by: Domnica Reutov

Community of Residence: Homer alaska

Comment:

My name is domnica reutov and I oppose proposal 51, 52 and 53.

Submitted by: Evdokia Reutov

Community of Residence: Homer

Comment:

Proposal 16

I support this Proposal and evidence supports that this supposed midwater trawl fishery is NOT what they claim. They do indeed target bottom fish for bycatch. Which causes great damage by destroying the natural seafloor habitat and disrupting the ecosystem. If nothing is done to prevent these so called midwater draggers, they will continue repeating history as what happened on the East coast the west coast. These factory trawler vessels are not observed and bycatch is reported by the skipper and processors. And heard of lots of unreported bycatch getting dumped back in the water by witnessed commercial fisherman on and off these factory draggers.

For conservation of the resources, ecosystem and to prevent overharvesting of bycatch. Shut down this only state managed PWS walleye pollock Factory trawlers. This would not be the first time trawl fishing has been closed in Alaska. Southeast waters have been closed since 1998.

PC516

Submitted by: Joe Reutov

Community of Residence: Cordova

Comment:

I strongly oppose proposals 51,52,53 and I am in strong support of proposal 57. As a 3rd generation fisherman I have seen first hand the fishery evolve from a larger ocean going boats to shallow running twin jet bow pickers that can zone in on the fish with great accuracy and I feel that permit stacking would benefit the fishery by thinning out the aggressive competition in the shallows of the copper river delta as well as the hatcheries of main bay and Wally norenberg and at the same time take some extra gear out of the water and bring back the fisheries to a more overall relaxed state. Another mention would be the benefit to the sport fishermen that cruise the sound with less overall gear in the water it eliminates that much more chances of illegal destruction to commercial fishing gear. That is why I am in strong support of proposal 57

PC517

Submitted by: Kerianna Reutov

Community of Residence: Wasilla

Comment:

I oppose number 5, 7, 51, 52 and 53 also i support proposal number 76

PC518

Submitted by: Pahisi Reutov

Community of Residence: Homer

Comment:

I oppose 5, 7, and 76 as well

PC519

Submitted by: Timofey Reutov

Community of Residence: Canby oregon

Comment:

I oppose proposals 51, 52, and 53. I fish in cordova alaska and it would be a big blow to our community.

Submitted by: Zina Reutov

Community of Residence: Canby oregon

Comment:

I oppose proposals 51, 52, and 53. They would be detrimental to our way of fishing and community.

Submitted by: Domnica Reutov

Community of Residence: Homer, Alaska

Comment:

My name is domnica reutov and I oppose proposal 48 and support proposal 49.

Submitted by: Domnica Reutov

Community of Residence: Homer alaska

Comment:

My name is Domnica Reutov, and I support Proposals 56 and 57.

Dual permit operations would be beneficial because they allow fishermen to be more efficient, especially with rising costs due to inflation. Combining permits reduces operating expenses and lowers the total number of permits actively fished, making the fishery more sustainable and economically viable for participants.

Submitted by: Domnica Reutov

Community of Residence: Homer, Alaska

Comment:

My name is domnica reutov and I support proposal 76.

Submitted by: Domnica Reutov

Community of Residence: Homer alaska

Comment:

My name is domnica reutov and I oppose proposals 5 and 7.

PC521

Submitted by: Domnica Reutov

Community of Residence: Homer alaska

Comment:

I support proposal 79 and 81.

PC522

Submitted by: Irmil Reutov

Community of Residence: Homer

Comment:

I oppose 51,52,53

PC523

Submitted by: Jonah Reutov

Community of Residence: Wasilla

Comment:

I am opposing proposal numbers 51, 52 and 53

PC524

Submitted by: Nikolai Reutov

Community of Residence: Homer

Comment:

I oppose proposals 51,52,53,5, 7 and 76

PC525

Submitted by: Pahisi Reutov

Community of Residence: Homer

Comment:

I oppose proposition 51 52 53

To: Alaska Board of Fisheries

Re: 2024 PWS Upper Copper/Upper Susitna Finfish & Shellfish Meeting Comments

Chair Carlson-Van Dort and board members,

The Chitina PU Dipnet fishery is important for many Alaskans to put food in their freezers, and under the current regulations I believe it is sustainable. I don't want to see reductions to the personal use harvest or fishing time that are not based on real salmon conservation concerns.

I also don't believe that limiting harvest or restricting fishing time for the PU fishery when the commercial fishery is closed for a certain amount of time makes sense, as when sonar counts are low the PU fishery (along with commercial fishery) is restricted.

Proposals I Support: 58, 59, 70

Proposals I OPPOSE: 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71

Thank you for your service on the board, and ensuring that our fish are managed sustainably with an emphasis on protecting the ability of Alaskans to put food in their freezers,

Mark Richards – Fairbanks

Submitted by: Diana Riedel

Community of Residence: Cordova

Comment:

I oppose proposals #51,52, and 53

Dear Board of Fish, I am a NVE tribal member and lifelong resident of Cordova. My husband, daughter, and I all grew up commercial fishing and still rely on this as our main source of income. I oppose proposals 51,52, and 53 because stock diversity issues have not been documented, early season fish go by the sonar before it is even installed, it can take anywhere from 5-9 days for salmon to even get from the upper markers to the sonar, at any given time there can be over half a million salmon in this staging area, there is a substantial amount of overlap between different stocks in the copper river for run timing, In June the commercial fleet harvest fish from EVERY stock, there isn't clear stock separation, and this will have huge financial impact on our commercial fishing fleet and our community. Over 70 percent of our native village of Eyak tribal members are in some way financially supported by this fishery. Thank you for considering this.

Submitted by: Paul Ritz , SCI

Community of Residence: Anchorage

Comment:

oppose 63, 64, and 65 There is no evidence supporting closing the fishery

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

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Arik Roberts. I am a owner operator of a small pollock trawler F/V Miss Sarah, less then 100 foot. We have a crew of 5 guys all with family's. This is a family owned boat with a long investment in Alaskan fishing. We deliver all of our pollock to Kodiak and supports the coastal community of Kodiak and the vendors there.

We have been fishing PWS ever since I can remember. I personally have been on the boat since 2006 but the vessel has fished it for many years prior. It's a beautiful place and I can't stress enough how much we respect and love it. The fishery is managed very closely with lots of safety factors built in to make sure we stay within the set limits. We have close contact with the manager and check in several times a day also a limited amount of boats fishing at one time.

This fishery is extremely important to our vessel plan. Its usually one of the first things we do for the new year and the boat and crew rely on it heavily. We can't participate in crab or fix gear cod.

The Seafood Industry is in crisis with many boats including mine being on a fine line of making it. If anything we should be adding opportunity's not removing them. The loss of this fishery would be an extreme blow to us and our families.

I strongly oppose all four proposals. 14 and 16 would close the fishery outright. 15 and 17 would modify bycatch limits and change monitoring requirements. The ADF&G staff oppose all four and they are on the front lines with us seeing it first hand also. The department has Emergency Order (EO) authority to modify bycatch limits. The fishery operates under very restrictive bycatch caps. Bycatch is limited to no more than 5% of the total round weight of pollock harvested. The cap for rockfish is 0.5% and for salmon is 0.04%. The average number of rockfish taken between 2021 to 2023 was 759 individual rockfish and 888 individual salmon compared to the average pollock catch for the same years of 6 million pounds. The department has the authority to deploy observers on our vessels. My vessel carries at-sea observers in the federal fisheries when required and is also participating in the Electronic Monitoring Program for the federal pelagic pollock fishery. For the federal EM program my cameras are on all the time. I am accustomed to being heavily monitored as a trawler. We are required to keep all the pollock, rockfish and salmon that we catch. Any ex-vessel revenue above the 300,000 pollock trip limit or the

allowable incident catch limits for rockfish must be surrendered to the SOA. All catch is dumped directly into the tanks with ZERO sorting so what we catch is exactly what we deliver. Our gear is extremely expensive so there is no incentive for us to put it on the bottom. The risk vs reward is not worth it. My vessel also has a live feed camera so I can see exactly what I'm catching at all times. More vessels every year are trying to make this investment even in these trying times. One last point is the fact of pollock predation on salmon smolts would increase due to a closing of the fishery.

Thank you for the opportunity to comment.

Sincerely, F/V MISS SARAH Arik Roberts

Submitted by: Thomas Robertson

Community of Residence: Anchorage

Comment:

Proposal 89 I think the increase of the burbot limit in Lake Louise is a bad idea due to the fact that I have been in the sport fishing industry for the last 30 years at a retail fishing Store. I have seen a dramatic increase the amount of Anchorage residents going to Lake Louise to Fish for Lake Trout and Burbot. It's one of the largest increases I have seen in many years, it would be much better to put a slot limit on Burbot then to increase the take. Conservation of the resource, ensures its longevity for the long-term.

Submitted by: Alissa Nadine Rogers

Community of Residence: Bethel, Alaska

Comment:

I, Alissa Nadine Rogers am in support of Proposal 14 regarding the protection of the habitat and sea floor. As well as the protection of Chinook Salmon. Since 1999, the Kuskokwim river has been working to rehabilitate the population of salmon. As the Kuskokwim Salmon populations have been the weakest in history. We are also in support of other regions rebuilding their stocks and protection of all Chinook Salmon stocks. This unity is first on the history books to protect a resource from extinction. Only together we will be able to make the difference in rebuilding populations and resources necessary for the health, wellbeing, and protection of our future stocks.

Submitted by: Ryan Rogers

Community of Residence: Valdez, Ak.

Comment:

I strongly oppose measure 78 as I feel there is not any verifiable science to show that the hatcheries negatively impact other resources. Furthermore, this would have a direct impact negatively to the PWS communities through decreased fish tax revenues as well as reduced income by local fishers.

My name is Matt Rohde and I am the captain of the fishing vessel Dawn. The Dawn is a 96-foot trawler based out of Kodiak Alaska. The Dawn is a family-owned vessel, along with three other vessels, Nichole, Chellissa & Mar Del Norte.

All together we employ at least 13 crew members a year. We try to fish for ten months out of the year, this is the sole financial income to all of our families.

I have been in the trawl industry for 10 years now and have ran the boat for four of those years. Since I have been running the boat, we have been involved in the Prince Williams Sound fishery. The PWS fishery has been a lifeline for our operation while waiting for the gulf pollock fishery biomass to become quicker & cleaner fishing around mid-February. We rely on the PWS fishery which opens mid-January. With high fuel prices, low fish prices, and having to travel many miles to catch our fish, we need any open fishery we can get. Prince Williams Sound is a closely managed fishery. We all have to check in with ADFG multiple times a day, reporting bycatch (if any) and each haul, and how much weight per haul.

Every year becomes harder and harder with shutdowns and lower fish prices to continue to stay afloat. This is why I oppose Proposals 14,15,16 and 17.

Submitted by: Greg Ronne

Community of Residence: Wasilla

Comment:

Hello, I would like to voice my support for proposal #14. Commercial fishing is an important part of our economy however, trawl fishing is often detrimental to the seafloor and other non-targeted species. Our fisheries accross the state are already in jepordy from a variety of impacts. This is one that we can control by discontinuing this type of harvest.

Submitted by: Brett Roth

Community of Residence: Anchorage

Comment:

[Proposal 1] This proposal needs refinement, as the proposer mentions, and would benefit from community workshopping through ADF&G Advisory Councils and other groups to come up with guidelines that might better guide the board in a future proposal. I do not think the board has the resources to define a well thought out regulatory framework this during this cycle's board meeting. .

Submitted by: Brett Roth

Community of Residence: Anchorage

Comment:

[Proposal 3] I would like to modify my proposal to make larger opening pot gear legal in Prince William Sound specific to the Sablefish fishery. This will be a more stepwise approach.

I propose the text of the proposal be amended as follows:

Groundfish pots as defined in 5 AAC 28.050 may have individual tunnel eye openings with a perimeter greater than 36 inches in the Prince William Sound regulatory area in the Prince William Sound Sablefish Fishery if unused Halibut IFQ is on board.

Submitted by: Brett Roth

Community of Residence: Anchorage

Comment:

[Proposal 2] This seems like a reasonable idea and I would think that impact on tanner crab, positive or negative, from this action are very hard to quantify and probably are negligible in either direction.

Submitted by: Brett Roth

Community of Residence: Anchorage

Comment:

[Proposal 17] This proposal should be modified in such a way that the observer coverage is industry funded.

Submitted by: Michelle Roth

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 and support proposals 48,51,52,53,58,59,70.

Submitted by: Thomas Roth

Community of Residence: Eagle River/Anchorage

Comment:

I am writing to submit my adamant opposition to Proposals 60, 61, 63, 64, 65, 66, 67, 68, 69, and 71. As an Alaskan and retired Army veteran, I and my family depend on the Copper River Personal Use Dip Net Salmon Fishery and Chitina Subdistrict for the annual harvesting of Copper River Sockeye and King salmon. As an aging veteran, I am also reliant on fishing guide services to access dipnetting locations on the river.

Submitted by: Sarah Rovner

Community of Residence: Kenai

Comment:

I don't have a boat or a way to safely dipnet, and charters like AK-X are extremely important to my access to healthy food. I do live in Kenai but I tend to stay away from the Kenai beaches. I would like to see continued access to charters like AK-X as an important way for residents to have safe access to subsistence fisheries.

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, sport, and subsistence fisherman. As a commercial fisherman, hatcheries have benefited me directly. A 25% egg take decrease would make it harder to make a living as a commercial fisherman and does not have a strong basis in science to do so.

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,

Justin Ryan

[REDACTED]

Cordova, Alaska

Submitted by: Guy Sachette

Community of Residence: Willow

Comment:

Alaska resources should be shared by all Alaskans.

Submitted by: Matthew Salisbury

Community of Residence: Anchorage

Comment:

Bottom Trawling's destructive nature cannot be allowed in Alaskan waters. Bottom trawling is unsustainable, while causing permanent damage to the sea floor.



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,

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, considerably Chinook salmon, shortracker rockfish, and roughey rockfish. 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. Shortracker and roughey rockfish are non-pelagic rockfish and have been reported as bycatch in the PWS pelagic pollock trawl fishery. The National Marine Fisheries Service now estimates bottom contact up to 60% of the time for small pelagic trawl vessels like those used in PWS. The bycatch that is found in the pelagic trawl nets displays an unsustainable fishery that is dragging the seafloor. The PWS trawl fishery relies on skipper and processor fish tickets to account for this fishery's bycatch data. Without adequate third-party observer coverage or electronic monitoring available, bycatch rates cannot be truthfully and accurately reported. 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.

RE: PROPOSAL 14: 5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management 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 a fishery and should require observer data to verify recorded bycatch.

Sincerely,

1. Constance Smith Anchorage, AK	2. Rebecca Lyon Anchorage, AK	3. Terry Wilson Fairbanks, AK	4. Jeanne Webster Anchorage, AK
5. Joyanne Bloom Juneau, AK	6. Landon Page Anchorage, AK	7. Jim Steffen Sitka, AK	8. Deborah Gravel Haines, AK
9. Kyle Coffman Wasilla, AK	10. Stephanie Stout Big Lake, AK	11. Tim Ewing Anchorage, AK	12. Rick Johnson Anchorage, AK
13. Noelle Camarena Cordova, AK	14. Lance Preston Sitka, AK	15. Ed Schmitt Soldotna, AK	16. Carol Race Juneau, AK
17. Mark Niver Wasilla, AK	18. Daniel Cannon Jr Juneau, AK	19. Luann Mcvey Douglas, AK	20. Linda Ayer Valdez, AK
21. Thomas Fisher Juneau, AK	22. Richard Gustafson Homer, AK	23. Terry Cummings Anchorage, AK	24. Vicki Kowacki Anchorage, AK
25. Margaret Parsons Anchorage, AK	26. Ann Sugrue Anchorage, AK	27. Tyler Boyes Anchorage, AK	28. Brandt Meixell Cordova, AK
29. Joan Franz Fairbanks, AK	30. Susan Smith Fairbanks, AK	31. Erik Lewis Wasilla, AK	32. Wayne Pichon Anchorage, AK
33. Terri Patton Anchorage, AK	34. Tyler Henegan Anchorage, AK	35. Dorothy Hill Soldotna, AK	36. Edgar Sundeen Wasilla, AK
37. Samuel Mcbeen Tenakee Springs, AK	38. Susan Gill Juneau, AK	39. Susan Love Valdez, AK	40. Madison Halloran Anchorage, AK
41. Joel Ingersoll Anchorage, AK	42. Margaret Mcneil Anchorage, AK	43. Dave Maternowski Girdwood, AK	44. Jeffrey Johnson Delta Junction, AK
45. Brenan Hornseth Seward, AK	46. Katherine West Anchorage, AK	47. Sara Thiele Anchorage, AK	48. Francis Gallela Anchorage, AK
49. Kent Barkhau Sitka, AK	50. Crystal Morawitz Homer, AK	51. John Cannon Kodiak, AK	52. Easton Armstrong Eagle River, AK
53. Lisa Nkonge Anchorage, AK	54. Heidi Robichaud Haines, AK	55. Robert Standish Kenai, AK	56. Tara Findlay Homer, AK
57. Nancy Keen Haines, AK	58. Matt Crowe Soldotna, AK	59. Kate Persons Nome, AK	60. Marc Dumas Fairbanks, AK

61. Michael Salzmann Anchor Point, AK	62. Casimir Abramczyk Juneau, AK	63. Tim Linder Kasilof, AK	64. Kathy Howse Anchorage, AK
65. Francesca Popp-Wright Anchorage, AK	66. Jason Heinrichs Anchorage, AK	67. James Vande Voorde Anchorage, AK	68. Tom Tomasi Wasilla, AK
69. William Ledoux Wasilla, AK	70. Steven King Talkeetna, AK	71. Gregory Olsen Soldotna, AK	72. Shirley Nelsen Anchorage, AK
73. Lisa Roberts Anchorage, AK	74. Toby Gillespie Anchorage, AK	75. Stephanie Rathert Eagle River, AK	76. Joel Holladay Big Lake, AK
77. Liana Wayman Anchorage, AK	78. Toni Bocci Cordova, AK	79. Leslie Syvertson Wasilla, AK	80. Adam Cuthriell Girdwood, AK
81. Jessica Anaruk Anchorage, AK	82. Brian Kemp Anchorage, AK	83. Robert Shem Anchorage, AK	84. Courtney Moore Anchorage, AK
85. Julie Mcbrien Juneau, AK	86. Max Kritzer Anchorage, AK	87. Ellen Lachicotte Wasilla, AK	88. Amanda Bauer Valdez, AK
89. Laurel Epps Anchorage, AK	90. Brad Cure Juneau, AK	91. Rachel James Anchorage, AK	92. Harrison Cain Cordova, AK
93. Michael O'Connor Fairbanks, AK	94. Mary Martin Juneau, AK	95. Marsha Holbrook Anchorage, AK	96. Ken Hamrick Anchorage, AK
97. Joe Banta Anchorage, AK	98. Lindsay Johnson Haines, AK	99. Siri Hari Hari Singh Khalsa Anchorage, AK	100. Brian Svabik Seward, AK
101. Lindsey Schneider Homer, AK	102. Scott Lindquist Palmer, AK	103. Theresa Zietlow Anchorage, AK	104. Whitney Harness Homer, AK
105. Ben Huff Juneau, AK	106. Susan Lagrande Anchorage, AK	107. William Tatsuda Ketchikan, AK	108. Amanda Brandon Haines, AK
109. Jessica Roth Sitka, AK	110. Matthew Snader Clam Gulch, AK	111. Minnie Chase Bethel, AK	112. Susan Ware Anchorage, AK
113. Lorayne Embretson Anchorage, AK	114. Kathryn Rumery Sitka, AK	115. Kevan Corella Cordova, AK	116. Charles Bingham III Sitka, AK
117. Carly Wier Homer, AK	118. Oceana Wills Homer, AK	119. Bill Crumrine Soldotna, AK	120. Lynn Wilbur Juneau, AK

121. Mike Yanak Sitka, AK	122. Brita Mjos Anchorage, AK	123. Maureen Knutsen Naknek, AK	124. Michele Cornelius Gustavus, AK
125. Loreen Kramer Copper Center, AK	126. Lila Johnson Homer, AK	127. Felix Schneider Anchorage, AK	128. John Skeele Sitka, AK
129. George Donart Anchorage, AK	130. Stephen Lawrie Sitka, AK	131. Anna Hoover Anchorage, AK	132. Greg Turner Delta Junction, AK
133. Joshua Vantrease Anchorage, AK	134. Carole Guffey Anchorage, AK	135. Nancy Behnken Sitka, AK	136. Betsy Peratrovich Anchorage, AK
137. Susan Pacillo Anchorage, AK	138. Kevin Bopp Fairbanks, AK	139. Michael Tuohey Anchorage, AK	140. Mike Reidell Anchorage, AK
141. Kevin Shaffer Moose Pass, AK	142. John Breiby Wasilla, AK	143. Lynne Ammu Palmer, AK	144. Carol Jewell Anchorage, AK
145. John Daily Chugiak, AK	146. Travis Price Eagle River, AK	147. Ward Person Fairbanks, AK	148. Jennifer Wilkinson Anchorage, AK
149. Geri Inama Anchorage, AK	150. Elizabeth Figus Juneau, AK	151. Suzanne Little Anchorage, AK	152. Peter Melde Anchorage, AK
153. Michael Opheim Seldovia, AK	154. Sue Baker Chiniak, AK	155. Carolyn Brashar Anchorage, AK	156. Nicholas Cassara Palmer, AK
157. Nicolette Castellano Anchorage, AK	158. Grant Gullicks Chugiak, AK	159. Julia Person Homer, AK	160. Douglas Hope Anchorage, AK
161. Tess Hostetter Igiugig, AK	162. Cami Dalton Anchorage, AK	163. Erik Pierson Anchorage, AK	164. Selah Bauer Valdez, AK
165. Jill Weitz Juneau, AK	166. Lynnda Kahn Soldotna, AK	167. Andrew Kastning Anchorage, AK	168. Della Coburn Anchorage, AK
169. Jessica Adler Anchorage, AK	170. Deborah Burwen Anchorage, AK	171. Marcia Holt North Pole, AK	172. Darling Anderson Anchorage, AK
173. Sean Den Adel Cordova, AK	174. John Damberg Anchorage, AK	175. Dogan Ozkan Fairbanks, AK	176. Mary Hilcoske Anchorage, AK
177. Bill Neumeister Anchorage, AK	178. Santa Claus North Pole, AK	179. David Vought Soldotna, AK	180. Reginald Peratrovich Anchor Point, AK

181. Guy Lopez Big Lake, AK	182. Keils Kitchen Anchorage, AK	183. Betsy Jumper Bethel, AK	184. Brenda Tyler Anchorage, AK
185. Jacquelyn Bennett Eagle River, AK	186. Angela Larose Anchorage, AK	187. Joshua Bryant Wasilla, AK	188. David Cassino North Pole, AK
189. Bruce Service Anchorage, AK	190. Erik Bolton Wasilla, AK	191. Louis Dupree Homer, AK	192. Gabriella Palko Girdwood, AK
193. Felipe Abreu Anchorage, AK	194. Mary Soltis Sitka, AK	195. Michael Utley Anchorage, AK	196. Farrell Stoudt Anchorage, AK
197. Carl Adams King Salmon, AK	198. Gwenn Haslett Anchorage, AK	199. Ben Kramer Valdez, AK	200. Amy Christiansen Homer, AK
201. Clayton Smith Homer, AK	202. Becky Breeding Chugiak, AK	203. Darlene Holmberg Aniak, AK	204. Renee Blake Wasilla, AK
205. Sally Donaldson Juneau, AK	206. Marian Allen Sitka, AK	207. Bryan Ledahl Kenai, AK	208. Halldora Sigurdsson Anchorage, AK
209. Andrew And Alice Smith Anchorage, AK	210. Cynthia Hendel Eagle River, AK	211. Lisa Peltola Anchorage, AK	212. Lisa Sadleir-Hart Sitka, AK
213. Deborah Anderson Homer, AK	214. Gregory Rider Anchorage, AK	215. Bruce White Sitka, AK	216. Glenna Gannon Fairbanks, AK
217. Richard Rothstein Anchorage, AK	218. Tyler Katzmar Anchorage, AK	219. Corinne Ferre Kodiak, AK	220. Kachi Elicerio Fairbanks, AK
221. Michele Palatas Anchorage, AK	222. Bridget Maryott Homer, AK	223. Tony Arsenault Homer, AK	224. Erik Kokborg Cordova, AK
225. Nathan Peterson Sterling, AK	226. Michael Kampnich Craig, AK	227. George Peterson Ketchikan, AK	228. Barry Santana Wasilla, AK
229. Arenza Thigpen Anchorage, AK	230. Dillon Bennett Dillingham, AK	231. Roni Carmon Kenai, AK	232. James Farr Girdwood, AK
233. Sandra Tompkins Chugiak, AK	234. Edward Tubbs Anchorage, AK	235. Nancy Waterman Juneau, AK	236. Tessa Kraft Kodiak, AK
237. Joni Munson Anchorage, AK	238. Carmen Bydalek Anchorage, AK	239. Susanne Bolin Anchorage, AK	240. Michael Trotter Sitka, AK

241. Lori Stephenson Homer, AK	242. Jerimy Sapalo Anchorage, AK	243. Christie Willett Ketchikan, AK	244. Elizabeth Roderick Anchorage, AK
245. Gene Perkins Ketchikan, AK	246. Waska George Bethel, AK	247. Nelson Co Homer, AK	248. James Goodwin Soldotna, AK
249. Mariza Tovar Homer, AK	250. A D Granger Fairbanks, AK	251. Trevor Ose North Pole, AK	252. Lowry Brott Wasilla, AK
253. Scott Adams Homer, AK	254. Maureen Mcneill Girdwood, AK	255. Tisa Becker Douglas, AK	256. John Sisk Juneau, AK
257. Shelley Wickstrom Anchorage, AK	258. Susan Steinacher Nome, AK	259. James Apone Anchorage, AK	260. Kristine Harder Haines, AK
261. Daniel Till Palmer, AK	262. Jim Ayers Juneau, AK	263. Neil Akana Sitka, AK	264. Gary Mullen Glennallen, AK
265. Jeff Ambrosier Ninilchik, AK	266. Justin Mccaslin Anchorage, AK	267. Zachary Grumblis Anchorage, AK	268. Rosa Luhrs Togiak, AK
269. Catigan West Anchorage, AK	270. Ben Phillips Sitka, AK	271. Foma Reutov Homer, AK	272. Ray Tessaro Clam Gulch, AK
273. Randy Charles Big Lake, AK	274. Devin Johnson Anchorage, AK	275. Amanda Dunaway Hoonah, AK	276. Eric Oen Sitka, AK
277. Greg Cushing Sitka, AK	278. Todd Smith Gustavus, AK	279. David Bernhardt Sitka, AK	280. Earl C Durdle Port Alexander, AK
281. Julie Heckert Kenai, AK	282. Tom Hlavnicka Hoonah, AK	283. Celeste Weller Pelican, AK	284. Pamela Weaver Fairbanks, AK
285. Kate Crump King Salmon, AK	286. Corinna Dart Manley Hot Springs, AK	287. Murray Bartholomew Anchorage, AK	288. Charlotte Tanner Ward Cove, AK
289. Glenn Olson Anchorage, AK	290. Norman Hoppas Anchorage, AK	291. James Fish Fairbanks, AK	292. Jason Rivers Juneau, AK
293. April Woods Anchorage, AK	294. Tim Russell Healy, AK	295. Michael Irving Seward, AK	296. Terra Hanks Anchorage, AK
297. Emmy Olsen-Drye Homer, AK	298. Carol Oliver Golovin, AK	299. James Erickson Hoonah, AK	300. Keith Harmon North Pole, AK

301. Dan Anderson Valdez, AK	302. Corey Verdoljak Homer, AK	303. Chris Ofallon Anchorage, AK	304. Karl Holfeld Anchorage, AK
305. Rhonda Williams Fairbanks, AK	306. Michael Dalton Anchor Point, AK	307. Mary Hoppaa Anchorage, AK	308. Christine Everett North Pole, AK
309. Stephen Carmichael Anchor Point, AK	310. Dasia Gall Homer, AK	311. Richard Swenson Anchorage, AK	312. William Sulken Ketchikan, AK
313. Anna Petersen Anchorage, AK	314. Leanne Werner Anchorage, AK	315. Melody Ashenfelter Juneau, AK	316. Gail Johnson Valdez, AK
317. Bruce Baker Juneau, AK	318. Maryssa Soots Anchorage, AK	319. Ainsley Mckinney Anchorage, AK	320. K. Murphy Juneau, AK
321. Kerry Ivory Ouzinkie, AK	322. Leah Evans Homer, AK	323. Allison Dill Anchorage, AK	324. Steve Mcelfresh Ninilchik, AK
325. Garry Garrison Ketchikan, AK	326. Nathan Rocheleau Anchorage, AK	327. Jerty Fogg Seward, AK	328. Juan Carlos Schwantes Sitka, AK
329. Carol Wegener Petersburg, AK	330. A Mollan Girdwood, AK	331. Ryan Astalos Anchorage, AK	332. Karl Ashenbrenner Juneau, AK
333. Travis Handy Anchorage, AK	334. Tyson Rutledge Fairbanks, AK	335. David Hubbard Anchorage, AK	336. Brian Mckay Anchorage, AK
337. Cameron Gordon Anchorage, AK	338. Bradley Howe Wasilla, AK	339. Matthew Boldt Anchorage, AK	340. Jeremy Brown Houston, AK
341. Alana Davis Juneau, AK	342. Brandon Mcguire Anchor Point, AK	343. Cory Decook Homer, AK	344. Peter Jurczak Sitka, AK
345. James Clendenen Chugiak, AK	346. Clyde Vicary Anchorage, AK	347. Marc Orman Anchor Point, AK	348. Claudia Jacobson Soldotna, AK
349. Blair Hickson Wasilla, AK	350. Charity Goddard Smith Gustavus, AK	351. John Leiter Anchorage, AK	352. James Folan Tok, AK
353. Elizabeth Martin Ketchikan, AK	354. Mathew Horn Anchorage, AK	355. Krista Kissner Juneau, AK	356. Pete Lowney Valdez, AK
357. Anthony Robinson Anchorage, AK	358. Denis Schweighart Eagle River, AK	359. Claudia Bain Auke Bay, AK	360. K Murphy Juneau, AK

361. Cara Roberts Fairbanks, AK	362. Samantha Craig Anchorage, AK	363. Lucas Seymour Anchorage, AK	364. Marilyn Heiman Anchorage, AK
365. Kristin Hanson Anchorage, AK	366. Charlene Lane Wasilla, AK	367. Emily Cohen Anchorage, AK	368. Laurie Thorpe Wasilla, AK
369. Jeffrey Mans Cordova, AK	370. Melissa Norris Eagle River, AK	371. Steven Renner Palmer, AK	372. Melissa Crawford Homer, AK
373. Jon Kelley Anchorage, AK	374. Sal Cuccarese Jr Anchorage, AK	375. Aaron Hutson Anchorage, AK	376. Samuel Mcdaniel Anchorage, AK
377. Tyler Weber Kenai, AK	378. Brittany Lais Wasilla, AK	379. Caitlynn Adams Anchorage, AK	380. Shelly Leary Anchorage, AK
381. Phillip Otto Anchorage, AK	382. Sarah Hotchkiss Anchorage, AK	383. Cameron Platte Anchorage, AK	384. Gregory Giesbrecht Anchorage, AK
385. Tomo Spaic Anchorage, AK	386. Mark Koch Anchorage, AK	387. Justin Speakman Anchorage, AK	388. Jerry Burke Sterling, AK
389. Dorothy Odonnell Fairbanks, AK	390. Victor Hernandez Anchorage, AK	391. William Posanka Anchorage, AK	392. Eric Tyskiewicz Anchorage, AK
393. Ricky Dominguez Jr Anchorage, AK	394. Jude Andrew Anchorage, AK	395. Josue Gonzalez-Gil Anchorage, AK	396. Channing Buckmaster Anchorage, AK
397. Marc Matos Anchorage, AK	398. Jessica McCartan Anchorage, AK	399. Jeffrey Knisley Anchorage, AK	400. Benjamin Mcdougald Girdwood, AK
401. Burton Hanna Anchorage, AK	402. Tanner Hill Anchorage, AK	403. Cole Hill Soldotna, AK	404. Jennifer Sonneborn Homer, AK
405. Serena Mollenkopf Anchorage, AK	406. Jennifer Haas Anchorage, AK	407. Patrick Dolphin Kenai, AK	408. James King Anchorage, AK
409. Stanley Hintze Anchorage, AK	410. Megan Kelley Anchorage, AK	411. Allison Brooks Anchorage, AK	412. Hugo Compton Anchorage, AK
413. Cheryl Andrew Anchorage, AK	414. Dustin Bryant Anchorage, AK	415. Brook Bembenick Anchorage, AK	416. Christy Lee Anchorage, AK
417. Michael Metcalf Anchorage, AK	418. Sarahlily Stein Homer, AK	419. Tina Petereit Soldotna, AK	420. Tyler Lebbert Jber, AK

421. Walky Jeanty Anchorage, AK	422. Karma Ulvi Eagle, AK	423. Jan Crichton Juneau, AK	424. Mark Jacobson Soldotna, AK
425. Jasmine Jemewouk Anchorage, AK	426. Kellie Adolfae Anchorage, AK	427. Cael Brown Juneau, AK	428. Constance Markis Anchorage, AK
429. Michelle Meyers Anchor Point, AK	430. Gretchen Randolph Haines, AK	431. Tanya Holley Juneau, AK	432. Kaitlin Mccandless Anchorage, AK
433. Laura Deatherage Valdez, AK	434. Robert Deeter Tok, AK	435. Kimberly Killion Anchorage, AK	436. Christopher Effgen Anchorage, AK
437. Deb Corso Fairbanks, AK	438. Sharon Dayton Fairbanks, AK	439. Julian Ramirez Anchorage, AK	440. Michael Diemer Anchorage, AK
441. Robin James Valdez, AK	442. Rebecca Elijah Homer, AK	443. Mollie Dwyer Haines, AK	444. Patrick Bookey North Pole, AK
445. Tracy Morphis Fairbanks, AK	446. Randi Sweet Seldovia, AK	447. Daniel Suprak Wasilla, AK	448. Christopher Clark Palmer, AK
449. Justin Talley Kodiak, AK	450. Alex Brown Anchorage, AK	451. Johansen Brian Kenai, AK	452. Michael Jamison Fairbanks, AK
453. Joel Jackson Kake, AK	454. David Kaercher Anchorage, AK	455. Tim Ellis Valdez, AK	456. Lee Lubitsh-White Anchorage, AK
457. Alan Fish Anchorage, AK	458. Lesley Hammer Anchorage, AK	459. Michael Pendergast Wasilla, AK	460. Chris Byrnes Anchorage, AK
461. Dorena Montgomery Anchorage, AK	462. Donald Gray Anchorage, AK	463. Lonny Strunk Anchorage, AK	464. Amanda Brookover Jber, AK
465. Tristen Therrien Anchorage, AK	466. Theresa George Anchorage, AK	467. Molly Brown Anchorage, AK	468. Dadrian Blythe Anchorage, AK
469. R Gordy Vernon Homer, AK	470. Gary Liepitz Kenai, AK	471. Kerry Ivory Ouzinkie, AK	472. Cole Rehder Anchorage, AK
473. Adrienne Stohr Anchorage, AK	474. Elizabeth Bowen Anchorage, AK	475. Emma Reichl Juneau, AK	476. Christopher Joens Anchorage, AK
477. Jocelyn Stanley Anchorage, AK	478. Kimberly Miller Palmer, AK	479. John Mccleary Sr North Pole, AK	480. David Weister Anchorage, AK

481. Zoe Cramer Anchorage, AK	482. Linda Anodo Kodiak, AK	483. Joanna Johnson Seward, AK	484. Christy Weber Kenai, AK
485. David Weeks Ninilchik, AK	486. Marjorie Weeks Ninilchik, AK	487. Gregory Tatum Anchorage, AK	488. Sean Donahue Anchorage, AK
489. Juliann Floria Girdwood, AK	490. Troy Miller Anchorage, AK	491. Satch Olkjer Anchorage, AK	492. Jason Morrison Jber, AK
493. Donovan Johnson Anchorage, AK	494. Forrest Kuiper Fairbanks, AK	495. Eric Arrendale Eagle River, AK	496. Jessica Davis Fairbanks, AK
497. Vonda Rothgeb Ketchikan, AK	498. James Turnbull Valdez, AK	499. Kristin Smith Cordova, AK	500. Todd Winter Anchorage, AK
501. Colin Hurley Eagle River, AK	502. Douglas Lipinski Anchorage, AK	503. Ian Dorsey Glennallen, AK	504. Bill Frey Wasilla, AK
505. Katherine Dorsey Glennallen, AK	506. Jonathan Dorsey Glennallen, AK	507. Johanna Dorsey Glennallen, AK	508. Gordon Carlin Fairbanks, AK
509. Clayton Lempp Sitka, AK	510. Erin Mccarthy Anchorage, AK	511. Dustin Stoddard Kasilof, AK	512. Terrance Vraniak Wasilla, AK
513. Todd Fitzgerald Fairbanks, AK	514. Peter Filos North Pole, AK	515. Steve Ranney Cordova, AK	516. Christopher Feagle Bethel, AK
517. Jimmie Miller Anchorage, AK	518. Larry Miller Talkeetna, AK	519. Jon Mastroyans Anchorage, AK	520. Jacob Smith Wasilla, AK
521. Kathryn Kennemer Anchorage, AK	522. Ryan Butler Anchorage, AK	523. Celeste Winsor Anchorage, AK	524. Annie Eggert Palmer, AK
525. Princess Johnson Fairbanks, AK	526. Larry Hirai Anchorage, AK	527. Mackenzie Smith Wasilla, AK	528. Bill Mans Anchorage, AK
529. Kelsey Morgan Homer, AK	530. Roy Kallander Anchorage, AK	531. Frank Goldthwaite Sterling, AK	532. Margaret Pfister Anchorage, AK
533. David Fandel Anchorage, AK	534. Ivan Culliton Wasilla, AK	535. Heather Wilkinson Eagle River, AK	536. Jonathan Mishaan Wasilla, AK
537. Carl Seutter Wasilla, AK	538. Amy Walkere Willow, AK	539. Nicole Gricius Homer, AK	540. Travis Tollefsen Anchorage, AK

541. Stacy Corbin Cooper Landing, AK	542. Mark Madden Anchorage, AK	543. Donald Snovel Palmer, AK	544. William Jarrett Anchorage, AK
545. Aaron Ulmer Anchorage, AK	546. Lavon Gall Anchor Point, AK	547. Todd Steiner Homer, AK	548. David Winney Valdez, AK
549. Chloe Gall Anchor Point, AK	550. Evelyn Harden Homer, AK	551. Kyle Lutz Wasilla, AK	552. James Dunham Soldotna, AK
553. Colin Harrington Wasilla, AK	554. Matthew Florenski Wasilla, AK	555. Laura Cox Eagle River, AK	556. John Culp Eagle River, AK
557. Alex Fancher Anchorage, AK	558. Andrew Renner Palmer, AK	559. David Moeller Anchorage, AK	560. Daniel Oneill Two Rivers, AK
561. Todd Backman Wasilla, AK	562. Stuart Mitchell Anchorage, AK	563. Sven Paukan Saint Marys, AK	564. Veronica Harrington Wasilla, AK
565. Lans Saxon Wasilla, AK	566. Aj Glover Anchorage, AK	567. Sydnee Card Anchorage, AK	568. Dionici P Reutov Dionici P Reutov Homer, AK
569. Matthew Pyhala Kenai, AK	570. Mark Alderman Wasilla, AK	571. Andrew Mueller Palmer, AK	572. Jeffery Benkert Anchorage, AK
573. Jillian Burchfield Sitka, AK	574. Mark Card Anchorage, AK	575. Holli Card Anchorage, AK	576. Kat Quigley Juneau, AK
577. Aspen Knight Sitka, AK	578. William Niederhauser Kenai, AK	579. Thomas DeJulia Seward, AK	580. Esther Hopkin Palmer, AK
581. Audrey Fox Fairbanks, AK	582. Alex Kvasnikoff Homer, AK	583. Marilyn Pitts Soldotna, AK	584. Kara Axx Fairbanks, AK
585. Colleen Ward- Wilson Palmer, AK	586. Emma Moore Seward, AK	587. Matthew Cole Willow, AK	588. Allan Sherman Anchorage, AK
589. Brian Large Kodiak, AK	590. Ryan Armstrong Wasilla, AK	591. Kyle Bjella Fairbanks, AK	592. William C Juneau, AK
593. Gary Hamilton Craig, AK	594. Tim Latham Kasilof, AK	595. Dan Portwine Fairbanks, AK	596. Jon Gregg Fairbanks, AK
597. William Blake Anchorage, AK	598. Kylee Norquist Willow, AK	599. William Burke Palmer, AK	600. Roy Larson Valdez, AK

601. Norman Sparks Anchorage, AK	602. Angela Ferrari Anchorage, AK	603. Steven Harness Homer, AK	604. Royvan Chenault Wasilla, AK
605. Kristoffer Ocel Soldotna, AK	606. Patrick Inglet Eagle River, AK	607. Mark Randash Randash Wasilla, AK	608. Zina Card Anchorage, AK
609. Sean Daly Ketchikan, AK	610. Chris Illingworth North Pole, AK	611. Greg Colligan Healy, AK	612. Natashaia Ukatish Nanwalek, AK
613. Christopher Gray Soldotna, AK	614. Kendall Soares Soldotna, AK	615. Richard Mallowney III Anchorage, AK	616. Alice Johannewes Talkeetna, AK
617. David Neetz Fairbanks, AK	618. Glenn Hermann Seward, AK	619. Kevin Wellington Wasilla, AK	620. Kerry Ivory Ouzinkie, AK
621. Terry White Anchorage, AK	622. Shelby La Forest Soldotna, AK	623. Andrew Smith Anchorage, AK	624. Kinka Parker-Aposik Anchorage, AK
625. Elaine Martin Palmer, AK	626. Mickey Wilson Anchorage, AK	627. Josh Bollaert Bollaert Anchorage, AK	628. Wade Johnson Tok, AK
629. Tim Nelson Fairbanks, AK	630. Jenessa Lorenz Whittier, AK	631. Lacey Johnson Tok, AK	632. Jeff Elkins Copper Center, AK
633. Michael Hensley Wasilla, AK	634. Devon Teeling Wasilla, AK	635. Jeffrey Sherman Anchorage, AK	636. Jonathan Samuelson Anchorage, AK
637. Rachel Munger Anchorage, AK	638. Kristen Dehaven Anchorage, AK	639. Jerry Fogg Seward, AK	640. Monica Casner Fairbanks, AK
641. Gerald Johnson Anchorage, AK	642. Alex Rodriguez Anchor Point, AK	643. Stacy Jensen Tok, AK	644. David Flood Palmer, AK
645. Tim Miller Wasilla, AK	646. P Mollan Girdwood, AK	647. Susan Jones Anchorage, AK	648. Michael Pascal Wasilla, AK
649. Gregory Johnson Tok, AK	650. Gregory Owens Tyler Sr Anchorage, AK	651. Amber Dolin Anchorage, AK	652. Holly Withner Anchorage, AK
653. Melinda Trenary Sitka, AK	654. Jonathan Silkett Anchorage, AK	655. Benjamin Higashi Anchorage, AK	656. Abby Dodd Anchorage, AK
657. Spencer Gunter Anchorage, AK	658. Jacob Fast Anchorage, AK	659. Bay Baskin Anchorage, AK	660. Marc Poage Fairbanks, AK

661. Penny Fitzwater Fairbanks, AK	662. Neil Mccurdy Wasilla, AK	663. Cody Moore Soldotna, AK	664. Terri Simmons Valdez, AK
665. Patricia Schmidt Fairbanks, AK	666. Kristy Mccullough Anchorage, AK	667. David Brausen Palmer, AK	668. Marty Jorschumb Ninilchik, AK
669. Ashton Hurlburt Anchorage, AK	670. Timothy Comer Craig, AK	671. Yasmin Radbod Anchorage, AK	672. Emily Ault Homer, AK
673. Julia Rogers Anchorage, AK	674. Joseph Molina Palmer, AK	675. Randy Moore Chugiak, AK	676. Lynnae St Louis Anchorage, AK
677. Kathleen Aronstam Anchor Point, AK	678. RONALDA Angasan Anchorage, AK	679. Brad Angasan Anchorage, AK	680. Dugger Cook Palmer, AK
681. James Lewis Eagle River, AK	682. Mark Sakalaskas Tok, AK	683. Carroll Johnson Tok, AK	684. Gary Cocozzo Togiak, AK
685. Karin Evans Seward, AK	686. Mark Habermann Anchorage, AK	687. Lilia Lundquist Anchorage, AK	688. Catherine Bradshaw Anchorage, AK
689. U Groeneweg Anchorage, AK	690. Mike Schuh Anchorage, AK	691. Vivian Shellabarger Sitka, AK	692. Suzanne Martin Anchorage, AK
693. Angel Bravo Kodiak, AK	694. Kegan Smith Gustavus, AK	695. Satchel Pondolfino Homer, AK	696. Carol Goddard Sitka, AK
697. Kathrin Mccarthy Juneau, AK	698. Kurt Keesecker Eagle River, AK	699. Earl Kain Tok, AK	700. Alaska Trollers Juneau, AK
701. Emily Wright Juneau, AK	702. Sheila Mccleary North Pole, AK	703. Travis Vietmeier Wasilla, AK	704. Brendan Mccabe Anchorage, AK
705. Zachary Kosa Fairbanks, AK	706. Nelli Vanderburg Valdez, AK	707. Marylou Vanderburg Valdez, AK	708. Beverly Westerdoll Gakona, AK
709. Sandra Cnossen Tok, AK	710. Katherine Cecil Fairbanks, AK	711. Jerry Cnossen Tok, AK	712. Rhett Davis Petersburg, AK
713. Emma Wilson Anchorage, AK	714. Angela Obren Valdez, AK	715. Anne Fuller Juneau, AK	716. Leann Cyr Sitka, AK
717. Caleb Craig Valdez, AK	718. Donald Snovel Palmer, AK	719. Samantha Benda Valdez, AK	720. Terrence Mccabe Valdez, AK

721. Wendy Caldwell Copper Center, AK	722. Libbie Graham Cordova, AK	723. Rebecca Smith Valdez, AK	724. Melvin Romero Eagle River, AK
725. Mararet Tourrant Anchorage, AK	726. Faye Ewan Copper Center, AK	727. Barbara Blake Juneau, AK	728. Andrew Roberts Sitka, AK
729. Sarah James Fairbanks, AK	730. Joel Jackson Kake, AK	731. Lydia Mandregan Anchorage, AK	732. Carol Barnes Anchorage, AK
733. Tamela Tobia Eagle River, AK	734. Kara Stocker Anchorage, AK	735. Margaret Nelson Anchorage, AK	736. Zona Mullins Anchorage, AK
737. Melissa Hopson Anchorage, AK	738. Leanne Lusk Eagle River, AK	739. Victor Demoski Anchorage, AK	740. Leslie Pierce Anchorage, AK
741. Cody Crawford Anchorage, AK	742. Amie Jordan Anchorage, AK	743. Jan Darrington Anchorage, AK	744. Gina Poths Anchorage, AK
745. Michael Olen Eagle River, AK	746. Ben Olen Eagle River, AK	747. Kyle Tupper Anchorage, AK	748. Brenda Byrd Anchorage, AK
749. Joanna Chaffin Anchorage, AK	750. Michael Chaffin Anchorage, AK	751. Roger Lowe Anchorage, AK	752. Sheila Lowe Anchorage, AK
753. Jeanine Keppel Anchorage, AK	754. Miguel Najera Anchorage, AK	755. Wendy Isbell Anchorage, AK	756. Kathy Bowman Wasilla, AK
757. Sonia Padgett Wasilla, AK	758. Raymond Padgett Wasilla, AK	759. Antonio Fullwood Anchorage, AK	760. Susan Kiggins Anchorage, AK
761. Jodi Benham Anchorage, AK	762. Anne Masneri Anchorage, AK	763. Steve Noonkesser Anchorage, AK	764. David Mcclannahan Eagle River, AK
765. Todd Draper Eagle River, AK	766. Vikki Draper Eagle River, AK	767. Ju-Lan Baxter Anchorage, AK	768. Brenda Gumminger Wasilla, AK
769. Robert Gumminger, Jr. Wasilla, AK	770. Terra Colegrove Anchorage, AK	771. Kyndal Cox Eagle River, AK	772. Heather Gadson Anchorage, AK
773. Angela Madrid Anchorage, AK	774. Lena Jacobs Anchorage, AK	775. Henry Riggs Eagle River, AK	776. Jessica Passini Eagle River, AK
777. Brandon Lee Eagle River, AK	778. Miguel Rosario Anchorage, AK	779. Rebecca Guyer Anchorage, AK	780. Kilian Burger Anchorage, AK

781. Naneh Burger Anchorage, AK	782. William Baxter Anchorage, AK	783. Corina Kramer Kotzebue, AK	784. Bryan Sharp Anchorage, AK
785. Nora Elliott Anchorage, AK	786. Sheryl Ishihara Anchorage, AK	787. Glenn Clane Anchorage, AK	788. Winton Voetmann Eagle River, AK
789. Ruby Shea Anchorage, AK	790. Margaret Langdon Anchorage, AK	791. Tom Atkinson , AK	792. Katherine Dirks Wasilla, AK
793. Mary Demers Anchorage, AK	794. Gabriel Anaruk Anchorage, AK	795. Bryant Steele Anchorage, AK	796. Dorothy Shockley Fairbanks, AK
797. Tiana Carthan AK	798. Jason Carthan AK	799. Ellen Kinchner AK	800. Brandon Civico AK
801. D Sizemore Muscle Shoals, AL	802. James Tucker Tuscaloosa, AL	803. Karen Spradlin Jacksonville, AL	804. Kenneth Walters Birmingham, AL
805. Carla Holder Harvest, AL	806. Maria Peteinaraki Heraklion City, AL	807. James Tucker Tuscaloosa, AL	808. Ron Blome Little Rock, AR
809. Kyle Schmierer Phoenix, AZ	810. Gerry Milliken Cottonwood, AZ	811. Carolyn Denton Mesa, AZ	812. Gloria Oswald Tucson, AZ
813. Jewell Batway Apache Junction, AZ	814. Catherine Williams Tucson, AZ	815. Barbara Mathes Rio Rico, AZ	816. Katherine Hinson Gilbert, AZ
817. Buchannon Crouch Jr Tucson, AZ	818. Dan Heffernan Glendale, AZ	819. Deborah Lane Prescott Valley, AZ	820. Stephan Donovan Oro Valley, AZ
821. Elizabeth Enright Scottsdale, AZ	822. Evan Lehr Pinetop, AZ	823. Scott Harrington Show Low, AZ	824. James Ashbrook Peoria, AZ
825. Bryon Harrington Springerville, AZ	826. Sherry Bruce Apache Junction, AZ	827. Christina Bruce Phoenix, AZ	828. Caylee Harrington Lakeside, AZ
829. Catherine Harrington Show Low, AZ	830. Catana Harrington Show Low, AZ	831. Adam Console Queen Creek, AZ	832. James Wegner Florence, AZ
833. Mark Rauguth Queen Creek, AZ	834. Yvette Rauguth Queen Creek, AZ	835. Jonah Rauguth Queen Creek, AZ	836. Claire Rauguth Queen Creek, AZ
837. Claudia Hoff Phoenix, AZ	838. Glenn Short Sherman Oaks, CA	839. Vincent Sereno Arnold, CA	840. Robert Cherwink Sonoma, CA

841. Betty Winholtz Morro Bay, CA	842. Dennis Jung Oceanside, CA	843. Linda Ulvaeus Santa Barbara, CA	844. Laurie Vann Rancho Cordova, CA
845. Russell Weisz Santa Cruz, CA	846. Jeff Stone Lakewood, CA	847. Charles Hammerstad San Jose, CA	848. Jeanette Hanneman Ahwahnee, CA
849. Phyllis Chavez Santa Monica, CA	850. Jasha Stanberry Carpinteria, CA	851. Elaine Benjamin Alpine, CA	852. Harold Tipping San Jose, CA
853. Elizabeth Dodge Berkeley, CA	854. Daniel Kowalski San Diego, CA	855. Regula Hess Dixon, CA	856. Paul Hunrichs Santee, CA
857. Barbara Poland La Crescenta, CA	858. Karen Jacques Sacramento, CA	859. Dennis Lees Encinitas, CA	860. Edie Bruce El Cerrito, CA
861. Robert Reed Laguna Beach, CA	862. Vic Bostock Altadena, CA	863. Querido Galdo Gualala, CA	864. Alice Polesky San Francisco, CA
865. Jamie Green Ventura, CA	866. JI Angell Rescue, CA	867. F. Carlene Reuscher Costa Mesa, CA	868. Leigh Castellon Richmond, CA
869. Roger Hollander Tarzana, CA	870. Jamie Le Alameda, CA	871. Steve Berman Berkeley, CA	872. Sondra Boes Campbell, CA
873. Lisa Ann Kelly And Family Santa Barbara, CA	874. Eric Nylen Santa Cruz, CA	875. Ann Wasgatt Roseville, CA	876. Ernest Boyd Sunnyvale, CA
877. Lacey Hicks Fremont, CA	878. Therese Debing Pacific Grove, CA	879. Jim Leske North Hills, CA	880. Elizabeth Darovic Monterey, CA
881. Sue Hall Castro Valley, CA	882. John Oda San Francisco, CA	883. Paul Wellin San Diego, CA	884. Candy Bowman Placerville, CA
885. Judith Falck- Madsen Carpinteria, CA	886. Cynthia Hellmuth Benicia, CA	887. Miriam Baum Rancho Cucamonga, CA	888. Vicki Hughes Huntington Beach, CA
889. A.L. Steiner Los Angeles, CA	890. Protect All Things Wild And Wonderful San Diego, CA	891. Neal Steiner Los Angeles, CA	892. Noah Youngelson Los Angeles, CA
893. Stacie Charlebois Sebastopol, CA	894. Colleen Rodger El Sobrante, CA	895. Marsha Lowry El Sobrante, CA	896. Kathleen Duncan Somes Bar, CA
897. Jann Nichols Adelanto, CA	898. Tina Ann Bollinas, CA	899. Deborah Santone Pleasant Hill, CA	900. Charlene Kerchevall Oceanside, CA

901. Barbara Benzwi Oakland, CA	902. Veronica Michael Fairfield, CA	903. Hunter Wallof Soulsbyville, CA	904. Patricia Blackwell- Marchant Castro Valley, CA
905. Barbara Harper Castroville, CA	906. Stewart Wilber San Francisco, CA	907. Susan Brisby Lancaster, CA	908. Cliff Atendido Burlingame, CA
909. Harry Knapp Riverside, CA	910. Timothy Hanson Santa Monica, CA	911. Ann Stratten La Mesa, CA	912. W Lynch Los Angeles, CA
913. Robin Van Tassell Summerland, CA	914. Rollin Blanton Pasadena, CA	915. Melissa Williams La Quinta, CA	916. John Robey Berkeley, CA
917. Andy Lupenko Lemon Grove, CA	918. Diane Hestich Colton, CA	919. Camille Gilbert Santa Barbara, CA	920. Aj Cho San Leandro, CA
921. Forest Frasier Benicia, CA	922. J. Barry Gurdin San Francisco, CA	923. Michael Garitty Nevada City, CA	924. Rachael Denny Bradley, CA
925. Norm Wilmes Yuba City, CA	926. Linda Freeman Yuba City, CA	927. Joan Breiding San Francisco, CA	928. C. Yee Sacramento, CA
929. Kathryn Choudhury Moraga, CA	930. Hunter Wallof Soulsbyville, CA	931. D Gibeau Carmel Valley, CA	932. Laura Hendon Burbank, CA
933. V Bennett San Diego, CA	934. Alanna Russell Los Angeles, CA	935. Karen Jacques Sacramento, CA	936. Harlan Pease Lake Elsinore, CA
937. James Blackburn Lincoln, CA	938. George Walker Vacaville, CA	939. James Garner Costa Mesa, CA	940. Tim Schultz Ventura, CA
941. Charlie Brown Gardena, CA	942. Jeff Ottman San Juan Capistrano, CA	943. Michael Leong Sacramento, CA	944. Annette Faurote Sacramento, CA
945. Nancy McCormick Fresno, CA	946. John T Ford San Francisco, CA	947. Jeff Neubauer San Clemente, CA	948. Tori Norman Rio Linda, CA
949. Jeff Hacker Huntington Beach, CA	950. Chris Moore Denver, CO	951. Jonette Bronson Telluride, CO	952. Willard Goad Thornton, CO
953. Roy Ferguson Aurora, CO	954. Michael Aguilera Colorado Springs, CO	955. Michelle Sewald Denver, CO	956. Eric Vilmer Colorado Springs, CO
957. Lee Ulshoffer Littleton, CO	958. Del Stiewert Colorado Springs, CO	959. Laura Waterworth Aurora, CO	960. Beth Davidow Montrose, CO

961. Francelia Lieurance Salida, CO	962. Oliver Smith Lyons, CO	963. Kathryn Rose Denver, CO	964. David Inouye Hotchkiss, CO
965. Torunn Sivesind Lakewood, CO	966. Paddy Fletcher Grand Junction, CO	967. Eric Polczynski Pagosa Springs, CO	968. Dianne Alpern Boulder, CO
969. Marie Skubon Denver, CO	970. Tom Stiles Snowmass Vlg, CO	971. Charlotte Alexandre Thornton, CO	972. David Mitchell Denver, CO
973. Michael Jones Fort Collins, CO	974. Maryanne Jerome Boulder, CO	975. Lynn Welch Monument, CO	976. Janine Kondreck Denver, CO
977. Lisa Simms Colorado Springs, CO	978. Jody Lewis Grand Junction, CO	979. Sharon Balzano Wheat Ridge, CO	980. Tanya Piker La Junta, CO
981. Nathaniel Dorsey Colorado Springs, CO	982. Ed Cottrell Grand Junction, CO	983. Kurt Witte Lyons, CO	984. Justin Spohn Cortez, CO
985. Izzy Bartholomew Durango, CO	986. Joseph Sorcinelli Jr West Haven, CT	987. Patricia Chambers Winsted, CT	988. Susan Goldstein West Hartford, CT
989. Charlie Burns Norwalk, CT	990. Dominic Percopo West Haven, CT	991. Steven Andrychowski New Britain, CT	992. Janet Marineau Bristol, CT
993. Maure Briggs Vernon Rockville, CT	994. Emily Dickinson- Adams Suffield, CT	995. Sharron Laplante Md Tolland, CT	996. Joann Koch Lebanon, CT
997. Carol Collins Dover, DE	998. Elizabeth Watts Boynton Beach, FL	999. Linda Yaffe Riverview, FL	1000. Mary Johnson Edgewater, FL
1001. Marguerite Donnay Melbourne, FL	1002. Elizabeth Cruickshank Clearwater, FL	1003. Holly Crawford Coral Gables, FL	1004. Debora Hojda Miami, FL
1005. B. Z. Mary Esther, FL	1006. Gudrun Dennis Gainesville, FL	1007. Alice Gard Naples, FL	1008. Felicity Hohenshelt Jacksonville, FL
1009. Robert Wolf Naples, FL	1010. Darlene Wolf Naples, FL	1011. Stefan Taylor Tampa, FL	1012. Elizabeth Erpelding-Garratt St Augustine, FL
1013. Martha Burton Lakewood Ranch, FL	1014. Bruce Troutman Key West, FL	1015. Michele Laporte Lakeland, FL	1016. Annie Mccann Venice, FL
1017. Pam Nolan Wilton Manors, FL	1018. Jane Wiley Tampa, FL	1019. Kevin Silvey Seminole, FL	1020. Nancy McLaughlin Naples, FL

1021. Barb Morrison Clearwater, FL	1022. Susan Dorchin Delray Beach, FL	1023. George Craciun Thonotosassa, FL	1024. Babs Marchand Naples, FL
1025. Anna Louise E. Fontaine Lantier, FL	1026. Jim Loveland St Petersburg, FL	1027. Barbara Schwartz Ocala, FL	1028. Susan Lowe Sebastian, FL
1029. Marjorie Angelo Palm Coast, FL	1030. Suzy Siegmann Temple Terrace, FL	1031. Carmen Blakely Lutz, FL	1032. Stephen Blakely Lutz, FL
1033. Patricia Mcdonald Winter Park, FL	1034. Nancy Neumann Clearwater, FL	1035. Cheryl Watters Daytona Beach, FL	1036. Whitney Watters Saint Augustine, FL
1037. Jennifer Scott Fort Myers, FL	1038. Diane Kossman Fort Lauderdale, FL	1039. Jamie Thomas Middleburg, FL	1040. Kathleen Shabi Palm Coast, FL
1041. Melissa Bartalos Sarasota, FL	1042. Sam Booher Augusta, GA	1043. Ray Arthur Decatur, GA	1044. Sandy Crooms Valdosta, GA
1045. Jerry Banks Decatur, GA	1046. Veronica Bourassa Rossville, GA	1047. Kat Bowley Roswell, GA	1048. Teresa Faucett Kennesaw, GA
1049. Warren Dunn Macon, GA	1050. Michele Nihipali Hauula, HI	1051. Annalise Kindstedt Lihue, HI	1052. Steve Taylor Kailua, HI
1053. Dan Showalter Redding, IA	1054. Janet Romine Des Moines, IA	1055. Chuck Dusing Council Bluffs, IA	1056. Ann Ford Boise, ID
1057. Allen Tigert Bellevue, ID	1058. Douglas Shinn Nampa, ID	1059. Gisela Zech Boise, ID	1060. Marci Robinson Pocatello, ID
1061. Solo Greene Lapwai, ID	1062. Stratton Laggis Pocatello, ID	1063. Nicholas Bridgett Champaign, IL	1064. Sandy Webster Shorewood, IL
1065. Debra Kern Cary, IL	1066. Julia Testin Hawthorn Woods, IL	1067. Georgia Shankel Chicago, IL	1068. Linda Bridges Athens, IL
1069. Michael Rynes Naperville, IL	1070. Abigail Fanestil Wood Dale, IL	1071. Tony Jones Carbondale, IL	1072. Dimitra Lavrakas Oak Park, IL
1073. Allison Fradkin Northbrook, IL	1074. Bob Gendron Chicago, IL	1075. Donna Barrett Buffalo Grove, IL	1076. Roberta Kessler Crest Hill, IL
1077. Joseph Naidnur Peoria, IL	1078. Patrick Maloney Chicago, IL	1079. Martha Stopa Darien, IL	1080. Marianne Flanagan Des Plaines, IL

1081. Jennifer Smith Chicago, IL	1082. Judith Dawn Silver Chicago, IL	1083. Letitia Noel Chicago, IL	1084. Gary Nrown East Dundee, IL
1085. Kevin Plattner Secor, IL	1086. Gregory Fleming South Beloit, IL	1087. Bruce Hlodnicki Indianapolis, IN	1088. Sharon Baker Goshen, IN
1089. Veda Joy Leavenworth, KS	1090. Cammy Colton Overland Park, KS	1091. Paula Long Junction City, KS	1092. Melanie Owens Andover, KS
1093. Martin Kurzendorfer Louisville, KY	1094. Bradley Herstine Louisville, KY	1095. Johnny Hall Dana, KY	1096. Joshua Seff Lexington, KY
1097. Patricia Roles Louisville, KY	1098. Elizabeth Butler Henderson, KY	1099. Stephen Dutschke Louisville, KY	1100. Hardy Boudreaux Madisonville, LA
1101. Charlie Houdobre Jr Covington, LA	1102. Shelley Hartz Littleton, MA	1103. Theresa Deluca Melrose, MA	1104. Gary Thaler Revere, MA
1105. Judy Brewer Hampden, MA	1106. Michelle Collar North Attleboro, MA	1107. Nancy Mcrae Pepperell, MA	1108. Jordan Longever Dorchester, MA
1109. Bonnie Faith- Smith Cambridge, MA	1110. Amy Henry Northampton, MA	1111. Susan Querze Lawrence, MA	1112. Barbara Abraham Leominster, MA
1113. Catherine Carney- Feldman Ipswich, MA	1114. Brian Gingras Braintree, MA	1115. James Hadcroft Falmouth, MA	1116. Wendy Fossa Essex, MA
1117. Mark Vatousiou Feeding Hills, MA	1118. Michael Dias Jr Hyde Park, MA	1119. Bonnie Svec Rockville, MD	1120. Evan Krichevsky Potomac, MD
1121. Victoria Garrison Silver Spring, MD	1122. Cathy Barton Annapolis, MD	1123. Dominique Edmondson Upper Marlboro, MD	1124. Tracey Katsouros Waldorf, MD
1125. Patricia Burton Gaithersburg, MD	1126. Joy Kroeger- Mappes Frostburg, MD	1127. Margaret Chasson Kensington, MD	1128. Rosalind Ivens Bucksport, ME
1129. John Doucette Bath, ME	1130. Meryl Pinque Bangor, ME	1131. Lenore Sivulich New Gloucester, ME	1132. Tia Simon Gorham, ME
1133. Susan Weems Brunswick, ME	1134. Ronna Rivers Muskegon, MI	1135. Grace Strong Ironwood, MI	1136. Linda Luke Van Buren Twp, MI
1137. Rochelle Rollenhagen Bear Lake, MI	1138. Richard Smith Melvindale, MI	1139. Gerald Hallead Traverse City, MI	1140. Matt Brzezinski Saint Clair Shores, MI

1141. Pamela Goodman Muskegon, MI	1142. Ashley Yonker Kalamazoo, MI	1143. Ron Howard Delton, MI	1144. Paul Kripli Grand Rapids, MI
1145. Katherine Wright Milford, MI	1146. Haven Knight Rochester, MI	1147. Kathleen Nummerdor Cheboygan, MI	1148. Diana Duffy East Tawas, MI
1149. Daniel Solano Detroit, MI	1150. Ben Small Birch Run, MI	1151. Karen Walker Cohasset, MN	1152. Anne Franklin Bloomington, MN
1153. Heidi Ahlstrand Owatonna, MN	1154. Maureen Mccullough Brooklyn Center, MN	1155. JI Charrier Wayzata, MN	1156. Juliann Rule Avon, MN
1157. James Herther Saint Paul, MN	1158. Kristin Campbell Waconia, MN	1159. Melissa Cathcart Minneapolis, MN	1160. Laurie Arndt Duluth, MN
1161. Karen Walker Cohasset, MN	1162. Robert Mueller Lakeville, MN	1163. Edward Spevak Saint Louis, MO	1164. Mary Pat Wylie Ballwin, MO
1165. Till Meier Mora, MO	1166. Janet Funicelli Ferguson, MO	1167. Margaret Guilfoy Tyler Saint Louis, MO	1168. Anthony Donnici Liberty, MO
1169. Carolyn Ryan Saint Louis, MO	1170. Michael Crowden Harrisonville, MO	1171. Sherry Matthews Dittmer, MO	1172. Nezka Pfeifer Saint Louis, MO
1173. Julie Roedel Kirkwood, MO	1174. Gary Benham Galena, MO	1175. Richard Gey Mountain Grove, MO	1176. Ms Wylie Ballwin, MO
1177. Mark Caso Gulfport, MS	1178. Nellie Medlin Holly Springs, MS	1179. Peter Rody Columbia Falls, MT	1180. Robyn Lauster Bozeman, MT
1181. Nathan Bradley Billings, MT	1182. Scott Dutro Bigfork, MT	1183. Rochelle Gravance Columbus, MT	1184. Jennifer Nitz Missoula, MT
1185. Dr Jo Jones Missoula, MT	1186. Jill Fiedor Billings, MT	1187. Cassandra Rideg Huson, MT	1188. Tom Krumm Anaconda, MT
1189. Stephen Earle Missoula, MT	1190. Lin Farley Waynesville, NC	1191. Stacey Cannon Salisbury, NC	1192. Kicab Castaneda- Mendez Pittsboro, NC
1193. Robert Moore Wake Forest, NC	1194. Mahri Lewis Leland, NC	1195. Donald Harland Candler, NC	1196. Cindy Shoaf Salisbury, NC
1197. Jennifer Brandon Lexington, NC	1198. Jude Misurelli Brevard, NC	1199. Christine Puliselic Winston Salem, NC	1200. Heide Coppotelli Cedar Mountain, NC

1201. Mary Jeffrey Denver, NC	1202. Susan Galante Fuquay Varina, NC	1203. Richard Schulz Grifton, NC	1204. Jeff Stork Arlington, NE
1205. Meg Gilman Portsmouth, NH	1206. Robyn Dibble Raymond, NH	1207. Eric Speed Strafford, NH	1208. Duncan Duchov Winchester, NH
1209. Joanne Gates Peterborough, NH	1210. Erline Towner Milford, NH	1211. Wendy Henry Manchester, NH	1212. Ernest Mellon Southampton, NJ
1213. Allen Kessel Clifton, NJ	1214. Bonnie Brooks High Bridge, NJ	1215. Corey Schade Loch Arbour, NJ	1216. Ann Sandritter Old Bridge, NJ
1217. Julia Cranmer Mount Holly, NJ	1218. Jarrett Cloud Stanhope, NJ	1219. Arlene Aughey Saddle Brook, NJ	1220. Cheryl Dzubak Trenton, NJ
1221. Debra Berlan Garfield, NJ	1222. Jamie Greer West Orange, NJ	1223. Mary Rivas Riverton, NJ	1224. Dennis Morley Old Bridge, NJ
1225. Steve Troyanovich Florence, NJ	1226. Judy Fairless Warren, NJ	1227. Linda Mckillip Erial, NJ	1228. Ruth Boice Shamong, NJ
1229. Pamela Kane Bedminster, NJ	1230. Madeline Stetser Cape May Court House, NJ	1231. Lorraine Brabham Hoboken, NJ	1232. Kerry Heck Pequannock, NJ
1233. Michelle George Vernon, NJ	1234. Bill Wood Egg Harbor City, NJ	1235. Jessie Privett Albuquerque, NM	1236. I. Engle Tularosa, NM
1237. Laura Pitt Taylor San Jose, NM	1238. Susan Silberberg Peirce Santa Fe, NM	1239. Karole Kohl Albuquerque, NM	1240. Jeffrey McGraw Las Cruces, NM
1241. Pat Hanbury Reno, NV	1242. David Worley Reno, NV	1243. Malcolm Simpson Las Vegas, NV	1244. John Shirley Valney Reno, NV
1245. Malcolm Elgut Las Vegas, NV	1246. Tony Segura Las Vegas, NV	1247. John Keiser New York, NY	1248. Catherine Foley Stony Brook, NY
1249. Marilyn Derosa- Wilkie New Rochelle, NY	1250. Janet Forman New York, NY	1251. Naomi Klass Bethel, NY	1252. Liz Porter Bronx, NY
1253. Beth Darlington Poughkeepsie, NY	1254. Claire Prevost Granby, NY	1255. Henry Westmoreland Wingdale, NY	1256. Michael Madden New City, NY
1257. Brenda Psaras East Moriches, NY	1258. Scott Korman Floral Park, NY	1259. Scott Davis Fort Edward, NY	1260. Mark Hollinrake New York, NY

1261. Sandra Dal Cais Woodside, NY	1262. Maggie Frazier Windsor, NY	1263. Elizabeth Meszaros New York, NY	1264. Fay Forman New York, NY
1265. T Gargiulo New York, NY	1266. Jackie Stolfi Massapequa Park, NY	1267. Glenn Hufnagel Buffalo, NY	1268. Claudia Devinney Perry, NY
1269. Phyllis Corcacas New York, NY	1270. Manfred Zanger Roscoe, NY	1271. Victoria Furio Yonkers, NY	1272. J.Patricia Connolly New York, NY
1273. Michele Johnson Yorktown Heights, NY	1274. Andrea Zinn Brooklyn, NY	1275. Tavia Gilbert Nyack, NY	1276. Vincent Rusch Schenectady, NY
1277. X Harris Delmar, NY	1278. Mary Moderacki New York, NY	1279. Janet Moser North Baldwin, NY	1280. Elaine Livingston Vestal, NY
1281. Barbara Schrier Nichols, NY	1282. Boyce Sherwin Malone, NY	1283. Richard Tidd East Greenbush, NY	1284. Patricia Vineski South Colton, NY
1285. Patti Packer Scotia, NY	1286. Michael Cote Floral Park, NY	1287. Jill Nicholas Penfield, NY	1288. Kathy Rusch Schenectady, NY
1289. Joseph M. Varon West Hempstead, NY	1290. Kenneth Krynicki New York, NY	1291. Dennis Fassman Westbury, NY	1292. Beth Darlington Poughkeepsie, NY
1293. William Mcdonald Bloomfield, NY	1294. Elanor Nadorff Victor, NY	1295. M Moderacki New York, NY	1296. Kathy Rusch Schenectady, NY
1297. Ellen Dryer Loveland, OH	1298. Stephen Owen West Chester, OH	1299. Gwen Davis Westerville, OH	1300. Vicki Wheeler Deshler, OH
1301. Aloysius Wald Columbus, OH	1302. Peggy Fugate Oxford, OH	1303. Nadine Parish Wadsworth, OH	1304. Michael Seager Mentor, OH
1305. Denise Mulligan Oak Harbor, OH	1306. Stanley Schweiger Novelty, OH	1307. Jay Rigney Owasso, OK	1308. Jeff Young Portland, OR
1309. Michelle McAfee Williams, OR	1310. Janna Piper Portland, OR	1311. Kathy Stevenson West Linn, OR	1312. Donlon McGovern Portland, OR
1313. Katrina Gimbel Portland, OR	1314. Monica Gilman Estacada, OR	1315. Jay Humphrey Estacada, OR	1316. Tosh Myers Deer Island, OR
1317. S Cook Portland, OR	1318. Mark Galbraith West Linn, OR	1319. Dana Bleckinger Yachats, OR	1320. Jamie Shields Rainier, OR

1321. Maureen O'Neal Tigard, OR	1322. Amy Roberts Albany, OR	1323. James Hunt Florence, OR	1324. Debra Smith Milwaukie, OR
1325. Kurt Emmerich Medford, OR	1326. Catherine Morris Ashland, OR	1327. Brad Smith Williams, OR	1328. Sue Leonetti Veneta, OR
1329. Julie Buchenau Cloverdale, OR	1330. Andrew Chione Oakland, OR	1331. David Edwards Eugene, OR	1332. Rebecca Kimsey Sublimity, OR
1333. Steve Prince Eugene, OR	1334. Marie Wakefield Newport, OR	1335. Margaret Heydon Portland, OR	1336. Susan Heath Albany, OR
1337. Dan Morgan Eugene, OR	1338. Noelle Edwards Butte Falls, OR	1339. John Macdonald Portland, OR	1340. George Krumm Estacada, OR
1341. Gregg Josephson Tigard, OR	1342. Troy Cummins Lebanon, OR	1343. Stanley Prouty Rainier, OR	1344. Terry Walker Scappoose, OR
1345. Mark Grube Eugene, OR	1346. Martin Falk Beavercreek, OR	1347. Aarron Schmidt Cornelius, OR	1348. Stephen Bauer Salem, OR
1349. Bradley Rhoades Klamath Falls, OR	1350. Joe Terleski Gresham, OR	1351. Isabel Camarena Cottage Grove, OR	1352. Todd Deridder Portland, OR
1353. Eric Torgeson Oregon City, OR	1354. Jordan Brown Tigard, OR	1355. David Edwards Eugene, OR	1356. Beka Traver Gresham, OR
1357. Kirk Lavender Mulino, OR	1358. Thomas Nelson Lansdowne, PA	1359. David Smigas Homestead, PA	1360. Ronald Meredith Chambersburg, PA
1361. David Zanardelli Eighty Four, PA	1362. Edward Fannon Bellefonte, PA	1363. Robert Bergan Pottsville, PA	1364. David Meade Apollo, PA
1365. Dennis Schaef Meadville, PA	1366. Susan Babbitt Philadelphia, PA	1367. Sandra Bergan Pottsville, PA	1368. Carrie Swank Reading, PA
1369. Robert Gibb Homestead, PA	1370. Laura Chinofsky Southampton, PA	1371. Linda Granato Philadelphia, PA	1372. Nicola Nicolai Chester Springs, PA
1373. Lauren Mitchell Sewickley, PA	1374. Christine Walton Cecil, PA	1375. Rosemary Delpino Baden, PA	1376. Mike Peale Aston, PA
1377. Brenda Hartman Reading, PA	1378. Kevin Mccluskey Pittsburgh, PA	1379. Anne Jackson Birdsboro, PA	1380. Wayne Laubscher Lock Haven, PA

1381. Susan Porter Hawley, PA	1382. Elizabeth Seltzer Media, PA	1383. David Cebrick Dallas, PA	1384. Richard Zovack Canonsburg, PA
1385. Roger Deyoung Cabot, PA	1386. Michael James Haverford, PA	1387. Vittorio Ricci Genova, RI	1388. Robyn Deciccio Warwick, RI
1389. June Elliott West Columbia, SC	1390. Kelly Scheffer Greenville, SC	1391. Kathy Bradley Lugoff, SC	1392. Jim Melton Indian Land, SC
1393. Patricia Luck Johns Island, SC	1394. Christopher Marcille Clover, SC	1395. Chris Dacus Bell Buckle, TN	1396. Barbara McMahan Chattanooga, TN
1397. Robert Cobb Knoxville, TN	1398. Richard Williamson Crossville, TN	1399. Coleman Perry Jr Nashville, TN	1400. Val Brumby San Antonio, TX
1401. Ed Fiedler Austin, TX	1402. Linda Thompson Houston, TX	1403. Bo Baggs Port Arthur, TX	1404. L M Cypress, TX
1405. J. M. Cypress, TX	1406. Thomas Nieland Alamo, TX	1407. Donna Selquist Argyle, TX	1408. Caroline Sévilla Boling, TX
1409. Timothy Edward Duda San Antonio, TX	1410. Linda Fielder Carrollton, TX	1411. Laura Long Cedar Creek, TX	1412. Chris R Dallas, TX
1413. Jim Neal Nacogdoches, TX	1414. Martha Gorak Bellaire, TX	1415. Marce Walsh Houston, TX	1416. Carolyn Nieland Alamo, TX
1417. Judy Ehlingwarlick Colmesneil, TX	1418. Erin Kukay San Antonio, TX	1419. Kristin Addison Corpus Christi, TX	1420. Pat Lastrapes Houston, TX
1421. Karen Kawszan Klein, TX	1422. Trigg Wright Spring, TX	1423. Sandra Breakfield Dallas, TX	1424. Sabrina Eckles Lubbock, TX
1425. Shelley Bryan Rockport, TX	1426. Yvonne Fedeyko- Kirby Benbrook, TX	1427. Mark Blandford Amarillo, TX	1428. Russell Burdette Rockport, TX
1429. Randal Park Cedar Park, TX	1430. Robert Peinert Jr Md Palm Valley, TX	1431. Peter Payton Dallas, TX	1432. Jeremiah Watt Salt Lake City, UT
1433. Cheryl Fergeson Ogden, UT	1434. Richard Perkowski Bluff, UT	1435. Bryan Hansen Bluffdale, UT	1436. Nedra Carroll Midvale, UT
1437. Kim Frederick Providence, UT	1438. Bob Smith Richmond, VA	1439. Adam D'Onofrio North Dinwiddie, VA	1440. John Roche Front Royal, VA

1441. Jean Marie Vanwinkle Bedford, VA	1442. Mark Wise Hampton, VA	1443. Linda Walters Virginia Beach, VA	1444. Gerritt And Elizabeth Baker-Smith Portsmouth, VA
1445. Kevin Walker Reston, VA	1446. Theresa Hebron Fredericksburg, VA	1447. Joan Yater Alexandria, VA	1448. Richard Rutherford Staunton, VA
1449. Grace Holden Arlington, VA	1450. Hannah Brown Virginia Beach, VA	1451. Harrell Beck Seattle, WA	1452. Francis Estalilla Aberdeen, WA
1453. James Trussell Snohomish, WA	1454. Jolie Misek Lacey, WA	1455. Christina Davis Spanaway, WA	1456. Darlene O'Grady Monroe, WA
1457. Elyette Weinstein Olympia, WA	1458. Robin Corcoran Port Angeles, WA	1459. Harry Gerecke Vashon, WA	1460. Joanna Chesnut Tacoma, WA
1461. Steven Minerich Everett, WA	1462. Sara Eldridge Seattle, WA	1463. Armin Reimnitz Edmonds, WA	1464. Ty Wyatt Vancouver, WA
1465. Rb Craddock Craddock Walla Walla, WA	1466. Sarah Hafer Vancouver, WA	1467. Brenna Jurczak East Wenatchee, WA	1468. Rebecca Evans Seattle, WA
1469. Debbie Stempf Spokane, WA	1470. Virgene Link-New Anacortes, WA	1471. Marc Savarise Clinton, WA	1472. Janice Klinski Olympia, WA
1473. Kristine Parrish Maple Valley, WA	1474. William Obrien Vancouver, WA	1475. Keith Kaganak Seattle, WA	1476. Angie Dixon Clinton, WA
1477. Barbara Rosenkotter Deer Harbor, WA	1478. Robert Gardiner Olympia, WA	1479. Maryjo Wilkins Kennewick, WA	1480. Karl Demmert Camano Island, WA
1481. Florence Harty White Salmon, WA	1482. George Schoenfeld Winthrop, WA	1483. Becky Hardey La Conner, WA	1484. Tracy Ouellette Bow, WA
1485. Kate Nichols Port Townsend, WA	1486. Diane Sullivan Oak Harbor, WA	1487. Jeff Paskett Tacoma, WA	1488. William Franklin Sedro Woolley, WA
1489. Kevin Fink Lacey, WA	1490. Kevin King Battle Ground, WA	1491. Victoria Hall Burien, WA	1492. Carol Else Lakewood, WA
1493. Robin Jacobson Bellingham, WA	1494. Robert Brown Tacoma, WA	1495. Emily Van Alyne West Richland, WA	1496. Barbara Blackwood Spokane Valley, WA
1497. Kjersten Gmeiner Seattle, WA	1498. Amanda Dickinson Yakima, WA	1499. Cheryl Mitchell Spokane, WA	1500. James Jorgensen Shelton, WA

1501. Perrin Orton North Bend, WA	1502. Sharon Roorda Port Angeles, WA	1503. Sheryl Norris Clinton, WA	1504. T Weiss Hamilton, WA
1505. Dean Bearden Skokomish Nation, WA	1506. Joel Christopher Vancouver, WA	1507. Shawn Murray Olympia, WA	1508. John Beck Grayland, WA
1509. Doug Lumsden Arlington, WA	1510. Jeff Berg Vancouver, WA	1511. Joel Janetski Port Townsend, WA	1512. Bob Loomis Wenatchee, WA
1513. Dave Kirkendall Seattle, WA	1514. Adam Good Kennewick, WA	1515. Frances Hogan Vashon, WA	1516. Bill Spillman Skamokawa, WA
1517. Jeff Mcclelland Yacolt, WA	1518. Cynthia Wennemark Shelton, WA	1519. Nicholas Epperson Kent, WA	1520. Richard Monroe Bellevue, WA
1521. Joan Huddleston Seattle, WA	1522. Rosanne Anderson Cheney, WA	1523. Michelle Gramza Shoreline, WA	1524. Tanner Merrill Bellingham, WA
1525. Korey Yada Seatac, WA	1526. Jerry D Ambrosio Bellevue, WA	1527. Leslie Spurling Seattle, WA	1528. Maureen Belle Langley, WA
1529. Drew Carr Mercer Island, WA	1530. Lance Kammerud Blanchardville, WI	1531. Ellen Gutfleisch Sussex, WI	1532. Kent John Clark Sussex, WI
1533. Joan Oosterwyk Cottage Grove, WI	1534. Dave Searles Brodhead, WI	1535. David Henning Marshfield, WI	1536. Dameta Robinson Wisconsin Rapids, WI
1537. Kate Ber Ashland, WI	1538. Joyce Frohn Oshkosh, WI	1539. Nina Spelter Madison, WI	1540. Christine Johnson Burlington, WI
1541. Joyce Frohn Oshkosh, WI	1542. Daniel Rewolinski Milwaukee, WI	1543. Susan Klopfer Brookfield, WI	1544. John Wondzell Laramie, WY
1545. Carl Stapler Evanston, WY	1546. Ms Zentura Casper, WY		

Submitted by: Jennifer Sampson

Community of Residence: Fairbanks

Comment:

I oppose 63, 64, 65. Alaskans share salmon.

Submitted by: Michael Samson

Community of Residence: Fairbanks

Comment:

Oppose #63, 64 and 65.

Personal use fishery should be maintained.

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

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 been gillnetting with my dad since I was a kid, and been running my own gillnet operation for 5 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,

Jed Sapp

A black rectangular redaction box covering the signature of Jed Sapp.

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 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 39 - Establish season dates for a commercial golden king crab 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: John Schandelmeier

Community of Residence: Paxson

Comment:

Proposal 92

Correct wording on our proposal should say [May 15] as the end date for allowing use of bait, {not April 15} as printed in the proposal book

John Schandelmeier; chair, Paxson Advisory

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 fisherman who purse seines. I rely on hatcheries every year. Additionally I have participated in test fisheries and cost recovery for the hatcheries in SE Alaska. Hatcheries have provided additional income to me and my crew which in turn benefits the communities. I feel that a 25% decrease would snowball into at first a decrease and then down the line into an elimination of the hatcheries all together. I rely on these hatcheries for additional income.

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,

Amy Schaub

A solid black rectangular box used to redact the signature of Amy Schaub.

Wrangell, Alaska

Submitted by: Chad Schierman

Community of Residence: Wasilla

Comment:

Ample returning salmon and resource should be shared amongst all user groups.

Submitted by: Shelly Schmitt

Community of Residence: Anchorage

Comment:

Proposal 44

Shelly Schmitt Position: Oppose. Concur with ADF&G staff findings.

Proposal 45

Shelly Schmitt Position: Oppose. Concur with ADF&G staff findings and feel fishing in the mouth of the river is a detriment to the fish population.

Proposal 48

Shelly Schmitt position: Support. I do not have a boat and need the assistance of others to safely fish.

Proposal 49

Shelly Schmitt position: Oppose. I rely on transport services for subsistence access.

Proposal 50

Shelly Schmitt position: Oppose. Concur with ADF&G findings and support boat safety

Proposal 54

Shelly Schmitt Position: Oppose. Concur with ADF&G findings.

Proposal 55

Shelly Schmitt Position: Oppose. Concur with ADF&G findings.

Proposal 68

Shelly Schmitt Position: Oppose. Concur with ADF&G staff findings and I rely on boats for safety

Proposal 69

Shelly Schmitt Position: Oppose. Concur with ADF&G staff findings.

Proposal 71

Shelly Schmitt Position: Oppose. Concur with ADF&G staff findings. I rely on guide services.

Submitted by: Mike Schones

Community of Residence: Newport, or

Comment:

We are a 3rd generation fishing family. We have owned F/V Collier brothers since 1979. And have fished pollock in ALaska since 1993.

The captain of our boat, resides on Kodiak Island, he has a wife and 3 kids and has been our boat captain for 20 years.

The value of the fish we catch continues to go down, while costs of fishing fuel, upkeep, groceries, nets, equipment is all skyrocketing.

Our boat employs 2 captains and 4 crew members all with families of their own.

We oppose proposals 14 15 16 and 17 as these proposals negatively affect our bottom line.

The bycatch limits are already very prohibitive, and further restrictions would be detrimental for our whole operation.

Contrary to many peoples belief, mid water Trawling does not affect the the ocean floor and is not disruptive to the bottom eco system.

This fishery is 15% of our yearly income, and these proposals would be a real hardship to our business, our crew and our family.

Thank you

Mike schones

f/v Collier Brothers

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

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 been a permit owner and drift gillnet fisherman in area E since 2020, crewed a drift gillnet vessel in Bristol Bay for 2 years before that, and crewed on a seiner in area E for the preceding 5 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,

Jamie Schroeder

A solid black rectangular box used to redact the signature of Jamie Schroeder.

Glacier View, AK

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

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

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.

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.

November 24, 2024

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

Dear Board of Fisheries,

I am from Valdez, Alaska, and I am writing to express my strong 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 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.

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.

Sincerely,
Andrew Scudder

A solid black rectangular box used to redact the signature of Andrew Scudder.

Valdez, Alaska

Submitted by: Dave Seaman

Community of Residence: Little Tutka Bay

Comment:

I support proposal 16, closing trawling in PWS. If it's closed in other state waters, it should be closed in PWS as well. The bycatch issue is important, especially since it is self reporting. I was a commercial fisherman for 20 years and know how it is. Even more important is the issue of removing foundation species from the biome. Adfg is mandated to manage for all user groups and for the health of the ecosystem as a whole. Climate change and warming waters and the pressure of the trawl lobby are affecting ocean productivity. I don't believe adfg is doing a responsible job of managing our fisheries. Here in Kachemak Bay they have let the fishermen wipe out King Crab, shrimp, and Tanner crab. Close PWS to trawling period.

Submitted by: Mitchum Senior

Community of Residence: Palmer

Comment:

I oppose all additional restriction on our fishing rights. We are dependent on these fishing rights to support the needs are for a family. Any restriction on these rights are restriction on Our family ability to provide for our needs.

Submitted by: Matt Sheridan

Community of Residence: Fishhook

Comment:

Its always the big time money, out of staters trying to tread on the little guy. My question, why did you vote for Kamala Harris?

Submitted by: Daniel Sherwood

Community of Residence: Eagle river

Comment:

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

Opposition in behalf of these proposals to limit personal use fisheries to bolster the commercial intake.

Submitted by: Oleg Shiryayev

Community of Residence: Anchorage

Comment:

Current trawling practices result in exuberant amount of bycatch, which is completely wasted. The bycatch caused the Chinook salmon to become practically extinct from PWS and Cook Inlet. Trawling needs to be stopped.

I support proposals 14, 15, 16, and 17 aimed at reducing the amount of bycatch in PWS by trawlers.

Submitted by: Jonathan Shurtz , Copper River Wild LLC

Community of Residence: Chitina

Comment:

Prop 69,71

Eliminating commercial services/guiding on the Copper River is a terrible idea, fueled by misconceptions and entitlement to the resource from the CDFU and Ahtna. The personal use fishery isn't "exploding" with new business, and has steadily remained at (3 guided boat-based charters.) The take from these charters is 14%, and as such there is zero biological reason for eliminating these businesses. EVERY boat based charter is responsible for saving lives on an annual basis, and volunteer their time and equipment for SAR dispatches, working closely with The Alaska State Troopers and Chitina EMS. Having professional USCG licensed captains with boats at the ready has proven time and time again to be an irreplaceable lifesaving asset (and free) to the State, and eliminating this resource WILL create fatalities on the river, particularly when shore fishermen fall into this notoriously dangerous river. Finally, charters provide safe access to their clients, and abide by all laws.



Government Relations
208 Lake Street, Suite 2E, Sitka, AK 99835

abby.fredrick@silverbayseafoods.com

907.209.3037

November 26, 2024

Ms. Märit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Silver Bay Seafoods Comments on Proposal 78

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

Silver Bay Seafoods is a fishermen-owned seafood processing company with facilities throughout Alaska. Silver Bay's operations, fishermen and community partners in Southeast, Prince William Sound, and Kodiak depend on the fishery enhancement programs. **We oppose proposal 78.**

Hatchery production is managed through a rigorous public permitting process which involves many stakeholders and Alaska Department of Fish and Game (ADF&G) experts from multiple disciplines. ADF&G opposes proposal 78 on the grounds that hatchery operations are permitted to minimize impact on wild salmon stocks, and the commissioner can amend a permit if conservation concerns arise. Staff comments stated that proposal 78 "...did not provide evidence to support that current permitted pink and chum salmon egg-take levels adversely affect wild stocks, in or outside the Prince William Sound enhancement area."

Significant investments have been made in Alaska's salmon hatchery program and associated research to provide for sustainable salmon harvests and to bolster the economies of coastal communities while maintaining a wild stock priority. In particular, the work of the Alaska Hatchery Research Project provides information to show how these enhanced stocks interact with wild salmon. The team of scientists collaborating on this project are well respected and have broad experience in salmon enhancement, management, and wild and hatchery interactions.

Recently, there has been literature (Global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids; McMillan et al) published with assertions about the relationship between hatcheries and wild salmon, citing scientific reports to support these assertions. ADF&G reviewed this literature and the cited scientific papers with an eye towards Alaska's hatchery programs and research and reported their findings to the Alaska House Fisheries Committee on February 6, 2024. The ADF&G presentation concluded that this report may be useful outside of Alaska, but it is less useful for Alaska. The recording of Alaska Hatchery Update report can be found at

<https://www.akleg.gov/basis/Meeting/Detail?Meeting=HFSH%202024-02-06%2010:00:00#> and

a link to the presentation can be found here:

https://www.akleg.gov/basis/get_documents.asp?session=33&docid=28426

We support Alaska's outstanding hatchery program, which is rooted in strong scientific methodology and precautionary principles and sustainable fisheries policies to protect wild salmon populations. This program has demonstrated over 50 years of sustainable enhanced production to supplement and/or enhance our wild stocks, providing economic opportunity and food security to all user groups. A McDowell Group report ([Alaska+Hatchery+Impacts,+Executive+Summary.pdf](#)) identifies the economic contribution in 2018 of Alaska's salmon hatcheries to be 4,700 jobs, \$218 million in labor income, and \$600 million in total economic output. Additionally, ADF&G staff comments included the direct economic benefits to harvesters from the Prince William Sound pink and chum hatchery harvest which averaged \$10.8 and \$3.6 million dollars respectively between 2013 and 2022.

The entire Alaska seafood industry has suffered from a perfect storm of economic circumstances the last 2 years. Many coastal communities in Alaska depend on Alaska seafood for food security and for an economic foundation that sustains their economies. Often, the health of the Alaska seafood industry and the health of these communities are interdependent. The extent of these economic conditions are well detailed in the NOAA Alaska Seafood Snapshot published August 2024 and summarized in the executive summary found at <https://www.fisheries.noaa.gov/s3//2024-10/ak-seafood-industry-snapshot-10-31-2024-afsc.pdf>. The report cites a total direct loss of \$1.8 billion for harvesters and processors, and \$269 million in lost state and local tax revenue. While the seafood industry and communities try to recover from this, we ask Alaska's fisheries policy leaders to consider the strong need for stability and sound, science-based decision-making.

In closing, **we ask you to reject proposal 78** and continue to support the existing public RPT process and the Commissioner's strict oversight of the hatchery program. We ask you to work with ADF&G to further your understanding of Alaska-relevant science and listen to the hatchery community as we stress the importance of the Alaska salmon hatchery program to Alaskans and businesses. Finally, we ask that you prioritize stability and sound, science-based decision-making as you consider what a reduction in sustainable hatchery fishing opportunity may do to the many stakeholders that rely on this for food security and income, especially now.

Respectfully,



Abby Fredrick

Submitted by: Bernadette Simmons

Community of Residence: Anchorage

Comment:

Dipnetting has helped my family in securing food to eat and enjoy for a year. It has been a tradition since we moved here 15 years ago; venturing to Chitina to dipnet with a charter. It is the safe way for us to catch salmon for the family. It has been a tradition for my family to take a chartered Dipnetting with friends, increase friendships while sharing our love for salmon. Chartered Dipnetting provides safety and ensuring we follow the laws and regulation. Safety is the number 1 priority in the unforgiving waves of Chitina river. Please consider the following - 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

Submitted by: Travis Simonetti

Community of Residence: Wasilla

Comment:

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

Submitted by: Melanie Sipes

Community of Residence: Fairbanks

Comment:

I am writing in support of keeping the Chitina Personal Use Dipnet Fishery accessible for Alaskans like myself and my family. I am a fourth generation Alaskan, my children and I rely heavily on members of my family sharing their catch from Chitina every year. Limiting our access and/or lowering the catch limit will drastically affect our freezers, our finances, and ultimately our well-being. Alaska can be a healthy place to live for those of us who utilize the land and use our plentiful resources, anything to restrict families' personal use of this fishery is shameful and un-Alaskan. I strongly oppose these proposals: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72. I am in support of these proposals: 48, 58, 59, 70.

Please see the attached PDF for a summary of proposals that I oppose and support, the last line under each proposal is my stance as well.

Proposals 44–50 (Subsistence Proposals)

Proposal 44

What it does: This would allow subsistence fishermen to have more than the legal limit of gillnet gear onboard a vessel.

ADF&G Position: Oppose. Concerns it increases the potential to illegally deploy additional gear and enforcement would be challenging due to the size of the fishing area.

AK eXpeditions Position: Oppose.

Proposal 45

What it does: This would allow salmon to be taken for subsistence in the inside closure area described in 5 AAC 24.350(1)(B) unless all other Copper River king salmon fisheries have been restricted first.

ADF&G Position: Oppose. Aligns with subsistence priorities and user needs while maintaining conservation goals. This could complicate enforcement of the prohibition on selling subsistence-caught salmon. Commercial fishermen might exploit this by fishing in areas closed to commercial fishing under the guise of subsistence fishing and then selling their catch.

AK eXpeditions Position: Oppose.

Proposal 46

What it does: Require Copper River District subsistence fishery harvest reporting within seven days of harvest.

ADF&G Position: Neutral. ADF&G cites logistical challenges and user compliance issues.

AK eXpeditions Position: Oppose.

Proposal 47

What it does: Require inseason harvest reporting by Glennallen Subdistrict subsistence and Chitina Subdistrict personal use fisheries permit holders within 5 days of their fishing activity.

ADF&G Position: Neutral. Concerns include administrative burden and compliance challenges.

AK eXpeditions Position: Oppose.

Proposal 48

What it does: Allow guided fishing from a boat in the Copper River Glennallen Subdistrict subsistence salmon fishery.

ADF&G Position: Neutral. ADF&G does not see conservation issues presented by this proposal.

AK eXpeditions Position: Support.

Proposal 49

What it does: Prohibit commercial operators from transporting state subsistence permit holders engaged in subsistence fishing activities.

ADF&G Position: Neutral. Seen as restrictive for users who rely on transport services for subsistence access.

AK eXpeditions Position: Oppose.

Proposal 50

What it does: Prohibit the use of any electronics that may aid in locating fish, depth, or paths of travel, such as fish finders, depth finders, and chartplotters, while fishing from a boat in the Glennallen and Chitina Subdistricts.

ADF&G Position: Oppose. There is no evidence that permit holders using this technology experience higher harvest rates, and prohibiting these devices could affect boating safety.

AK eXpeditions Position: Oppose.

Proposals 54–55 (Salmon Management Plans)**Proposal 54**

What it does: This would allow for a maximum of three 12-hour fishing periods where the inside closure area (Figure 54-1) of the Copper River District is closed during statistical week 20 and 21. This would increase the number of periods with the inside waters open to commercial fishing.

ADF&G Position: Oppose. Inside-waters closures have been a longstanding management tool to conserve Copper River king salmon. Limiting the number of inside-water closures may result in unsustainable levels of king salmon harvest.

AK eXpeditions Position: Oppose.

Proposal 55

What it does: Require the department to restrict guided fishing for at least a week in the Upper Copper River drainage with at least one of the management measures outlined in the Copper River King Salmon Management Plan (5 AAC 24.361) when the commercial fishery is prohibited from fishing within the Copper River District king salmon inside closure area for more than two consecutive periods outside those required by the Copper River King Salmon Management Plan.

ADF&G Position: Neutral/Oppose. Unnecessarily reducing opportunity in the Upper Copper River sport and personal use fisheries based on commercial fishery restrictions implemented several weeks prior to the fish entering upriver fisheries because of management concerns at that time in the run. The department restricts upriver sport and personal use of fisheries as needed under general EO authority to ensure escapement goals are achieved.

AK eXpeditions Position: Oppose.

Proposal 58

What it does: Provide emergency order authority for the commissioner to increase the king salmon annual limit in the Copper River Chitina Subdistrict (CSD) personal use dip net salmon fishery when escapement is projected to exceed the upper bound of the spawning escapement goal.

ADF&G Position: Support. This provides flexibility to increase harvest opportunities while ensuring resource sustainability.

AK eXpeditions Position: Support.

Proposal 59

What it does: Provide emergency order authority for the commissioner to increase the sockeye salmon annual limit in the Copper River Chitina Subdistrict (CSD) personal use dip net salmon fishery when sockeye escapement is projected to exceed the upper bound of the spawning

escapement goal.

ADF&G Position: Support. Similar to Proposal 58, it allows additional harvest opportunities when resources are abundant.

AK eXpeditions Position: Support.

Proposal 60

What it does: Reduce the total annual limit in the Chitina Subdistrict personal use salmon dip net fishery. The limit for head of household would be reduced from 25 to 20 fish, and the limit for each additional household member would be reduced from 10 to 5 fish.

ADF&G Position: Neutral. The department does not have conservation concerns that require reducing harvest. The personal use fishery is managed inseason and harvest is controlled by reductions in fishing time determined weekly based on number of fish passing the Miles Lake sonar.

AK eXpeditions Position: Oppose.

Proposal 61

What it does: Reduce the total annual limit in the Chitina Subdistrict personal use salmon dip net fishery and reestablish supplemental periods for the harvest of additional sockeye salmon.

ADF&G Position: Neutral. The department does not have conservation concerns that require reducing harvest. The personal use fishery is managed inseason and harvest is controlled by reductions in fishing time determined weekly based on the number of fish passing the Miles Lake sonar.

AK eXpeditions Position: Oppose.

Proposal 62

What it does: Reduce the maximum harvest level in the Chitina Subdistrict personal use salmon dip net fishery to 50,000 salmon when the Copper River District commercial fishery is closed for 13 or more consecutive days.

ADF&G Position: Neutral/Oppose. Unnecessarily reducing opportunity in the personal use dip net fishery based on commercial fishery openings is unwarranted. The current abundance-based management approach within the Copper River Personal Use Dip Net Salmon Fishery Management Plan compensates for fluctuations in inseason and annual run strength and the department has general emergency order authority to further restrict the personal use fishery as needed to ensure escapement goals are achieved.

AK eXpeditions Position: Oppose.

Proposal 63

What it does: This would change the opening of the Chitina Subdistrict personal use dip net fishery to June 21 or 2 weeks after a daily management objective of fish passage is achieved at Miles Lake sonar.

ADF&G Position: Oppose. It is unnecessary for conservation because the Chitina Subdistrict personal use fishery harvest accounts for only a small portion of the sockeye and king salmon runs, and management of the fishery is abundance-based and designed to distribute harvest opportunity and escapement over the duration of the run.

AK eXpeditions Position: Oppose.

Proposal 64

What it does: This prohibits households from participating in the Chitina Subdistrict (CSD) personal use salmon fishery if an Upper Cook Inlet (UCI) personal use salmon fishery permit has already been issued to that household during that year.

ADF&G Position: Oppose. There are no management or sustainability concerns with households fishing both a CSD and UCI personal use salmon fishing permit in the same year. It unnecessarily restricts Alaskans' ability to participate in personal use fisheries and potentially restricts harvest of available surplus production. Allowing households to participate in both the CSD and UCI personal use salmon fisheries provides 169 opportunity and flexibility to sustainably harvest salmon to meet their household food security needs.

AK eXpeditions Position: Oppose.

Proposal 65

What it does: Require a weekly permit be obtained to participate in the Chitina Subdistrict (CSD) personal use fishery and require reporting be submitted within 7 days for each weekly permit.

ADF&G Position: Neutral. Inseason reporting would be an additional burden on users and the department, and compliance with weekly permit and the 7-day reporting requirement may be challenging to enforce. The department already 172 has the authority under 5 AAC 77.015 to require more frequent reporting but has not because it would not be used nor needed for inseason management.

AK eXpeditions Position: Oppose.

Proposal 66

What it does: Require the department, in consultation with the Hatchery Operator, to restrict time and area in the Chitina Subdistrict (CSD) personal use dip net salmon fishery to achieve the Gulkana Hatchery broodstock goal.

ADF&G Position: Oppose. Managing exclusively for Gulkana Hatchery sockeye salmon broodstock is impractical in a mixed stock fishery prosecuted on salmon 4 to 6 weeks prior to them reaching the hatchery spawning locations. Restricting time and area in this fishery would be an undue loss of opportunity for households participating in the CSD personal use fishery.

AK eXpeditions Position: Oppose.

Proposal 67

What it does: Prohibit removing king salmon from the water prior to release in the Chitina Subdistrict (CSD) personal use dip net salmon fishery.

ADF&G Position: Oppose. In other dip net fisheries where the release of king salmon is required, fishers may remove king salmon from the water prior to release. Because of the nature of fishing on the Copper River, it is unclear if leaving king salmon in the water prior to release would actually decrease king salmon mortality. Depending on how a fish is entangled, it may be impossible to release while keeping it in the water from the boat or a shore-based fishing site. Enforcement of the in-water release of king salmon would also be very difficult.

AK eXpeditions Position: Oppose.

Proposal 68

What it does: Prohibit using a dip net from a boat to harvest salmon in the Chitina Subdistrict (CSD).

ADF&G Position: Oppose. there are no management or biological concerns with using dip net gear from a boat, and it would increase conflict between users due to increased competition at shore-based sites. Many fishers may be physically limited and incapable of sweeping while wading or scaling steep terrain to access productive fishing sites.

AK eXpeditions Position: Oppose.

Proposal 69

What it does: Establish time and area restrictions for households dipnetting from a boat in the Chitina Subdistrict (CSD).

ADF&G Position: Oppose. This proposal could increase conflict between users, it will complicate enforcement, and it may not reduce harvests. It is unclear what proposed actions are to be taken or when they will be enacted.

AK eXpeditions Position: Oppose.

Proposal 70

What it does: Increase the size of the Chitina Subdistrict (CSD) by extending the lower boundary approximately 0.5 miles downstream.

ADF&G Position: Neutral. Increased harvest associated with the expansion will be minimal because households are already capped by their permit limits and the additional fishing area is not more productive than areas currently open.

AK eXpeditions Position: Support.

Proposal 71

What it does: Prohibit guided fishing from a boat in the Copper River Chitina Subdistrict (CSD) personal use dip net salmon fishery.

ADF&G Position: Oppose. The department does not have biological concerns that require reducing harvest. Total harvest in the CSD has never exceeded management parameters and harvest by guided dip netters accounts for only a small percentage of overall harvest. Guide services provide a valuable option for Alaskans wanting to access and harvest fish, including those with physical limitations.

AK eXpeditions Position: Oppose.

Proposal 72

What it does: Require the department to close the Gulkana River salmon sport fisheries when water temperature exceeds 18°C at any time during a 24-hour period for 3 consecutive days or exceeds 20°C.

ADF&G Position: Oppose. It is well known that salmon can experience physiological stress at elevated water temperatures and the department has authority to restrict fisheries during extreme temperature events. There is no evidence that the observed elevated temperature events in the Gulkana River have negatively impacted productivity nor elevated natural or hooking mortality. Anglers targeting salmon would be subject to highly unpredictable closures and openings based on

varying water temperatures. Resulting inseason management notifications would be often unworkable and fishing opportunities could be reduced.

AK eXpeditions Position: Oppose.

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 fisherman in Alaska since well before any local hatchery programs were started. As a salmon troller, I noticed large increases in the coho salmon populations, as a result of the hatchery programs of NSRAA, and to a lesser degree, SSRAA. Later I became a SE gillnetter, and that fishery depends heavily on hatchery chum salmon so, as such, I profited from the hatchery programs .

The large volumes of hatchery chums have also greatly benefited the troll fleet in SE. I'm not a seiner, so I'm not aware of any benefits concerning pink salmon. I'm in favor of continuing hatchery programs in the future.

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 Skeele



Sitka, Alaska

Submitted by: Joseph Skrha

Community of Residence: Kenai

Comment:

With so much unknown about why our King, Silver and other salmon are suffering in the ocean primarily due to Climate Change brought on by the burning of fossil fuels and sulphuric acid, I urge you to terminate all trawl fishing in Prince William Sound and surrounding waters. Give our salmon a break. I stopped fishing for them over 10 years ago and the intercept trawl fishery must cease also. The salmon need several generations to try to rebuild themselves without the pressure of the trawl fishery killing them.

Submitted by: Elsie Slanaker

Community of Residence: Ketchikan

Comment:

YES! Please protect the ocean floor!!

Submitted by: Brian Slease

Community of Residence: North Pole

Comment:

Comments selected below regarding subsistence use fisheries. Prioritizing commercial use fishing over the people is wrong.

Submitted by: Anthony Smith , AK Expeditions

Community of Residence: Fairbanks

Comment:

This company is extremely beneficial and very strong to show a lot of the community the incredible experience of fishing in Alaska. Most people that live in the interior learn how to fish through this charter and it would be a shame to see them have to go away due to cancellation of charters.

Submitted by: Clayton Smith

Community of Residence: Homer, AK.

Comment:

I'm weighing in on proposition 14 regarding pelagic trawl fisheries in PWS. I'm in favor of regulations making it illegal for trawl gear to contact the ocean bottom. In my opinion there shouldn't even be a trawl fishery in PWS.

Submitted by: Daniel Smith , Premiumprawns LLC

Community of Residence: Wrangell

Comment:

I am commenting on proposal 14 regarding the closure of pollock fishing unless more restrictive measures are taken, and enforced, to reduce habitat destruction and reign in the bycatch numbers. I support this proposal and any proposal that will restrict the pollock fishery in their current trajectory of eliminating all other user groups and destroying the marine environment. It is troubling that the short term economic gain of several large cooperations is currently treated as more important than the long term health of the oceans and all of the smaller scale users that rely on said oceans as a means to feed themselves and their families.

Alaska Board of Fisheries

Alaska Department of Fish and Game

P.O. Box 115526

Anchorage, AK 99811-5526

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Dave Smith, and after owning the F/V Lisa Melinda for 40 years I continue to represent and manage the vessel in my retirement. I am writing to oppose Proposals 14,15,16, and 17 regarding the PWS Pollock fishery.

The Lisa Melinda is a small 81 foot, independent family-owned trawl vessel based out of Oregon. While we call Oregon home, I have been fishing in Alaska for 34 years and our A season in the Gulf of Alaska is a very important part of the vessels income for the year before we return to the west coast for whiting. The ability to fish in Prince William Sound offers the vessel and crew their first paycheck of the year. Although the Federal CGOA Pollock fishery opens on January 20th the Pollock do not aggregate to spawn in the GOA usually until mid-February.

Most, if not all, of Alaska's state fisheries have outside participants, and we have been a responsible steward of all of Alaska's fisheries, including Prince William Sound for decades. The Lisa Melinda has had cameras on our boat for electronic monitoring in the whiting fishery since 2015 and we were one of the first boats to join when Alaska started testing EM in the Pollock fishery. The cameras are turned on 100% of all fishing trips ensuring that all catch, including salmon and rockfish, is retained. We do not do anything differently for our PWS trips as we do the rest of the year. The State of Alaska closely manages this fishery and they communicate with our captain on a daily basis when the vessel operates in the Sound. The State has authority to put observers on board our vessels at any time, and they would do so if they felt there was an issue. The Department opposes all four proposals, which should guide you as Board members.

Right now, things are extremely difficult financially for all of us whose livelihoods come from fishing and seafood related products. We need as many fishery options as possible to remain open and continue to provide income for our crews and coastal communities. Thank you for allowing the opportunity to comment and share my opposition the proposals 14,15,16 and 17.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Smith". The signature is stylized, with a large "D" and a cursive "Smith".

Dave Smith

November 24, 2024

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

Dear Board of Fisheries,

I am from Valdez, Alaska, and I was a seiner in Prince William Sound for 15 years. Now, I am a tender owner and operator. Salmon help our coastal communities thrive! I regularly take visiting friends and family to tour the Solomon Gulch hatchery, and I've also taken my crew and friends to three other hatcheries within Prince William Sound. Even when we don't make our living directly from fish—though I do—having good, fresh runs brings more people to town and helps local businesses survive. Hatcheries also keep our harbors in better shape, and bring more revenue to support small towns. Proposal 78 could be devastating to my business.

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 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,
Kristen Smith

Valdez, Alaska

PC572

Submitted by: Robert Smith

Community of Residence: Anchorage

Comment:

Trawl and its associated bycatch is ruining the Alaskan ecosystem. Regulate it immediately.

PC573

Submitted by: Cheryl Smith

Community of Residence: Kenny Lake

Comment:

Fishing rights!!!

PC574

Submitted by: Dwayne Smith

Community of Residence: Kenny Lake

Comment:

Our Fishing Rights

PC575

Submitted by: Kelly Smith

Community of Residence: Kenny Lake Alaska

Comment:

I am a lifelong Alaskan that grew up on the McCarthy Road and I depend on the subsistence lifestyle to continue my off grid, low as possible impact/close to the earth existence here in the copper basin. Please don't take away our subsistence rights.

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 deckhand in the PWS seine fishery with an interest in buying into the fishery in the near future. The hatchery-enhanced salmon in PWS have greatly benefited me over the last 8 years. Allowing me to purchase a home in Alaska and save money to buy into Alaska salmon fisheries. A 25% decrease in egg-take would be detrimental to our ability to make a living in PWS. It would make the profitability of commercial harvesting in the area very questionable. It will also greatly impact my decision of what fishery to enter into in the future personally.

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:

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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.

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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,

Carter Snow

A solid black rectangular box used to redact the signature of Carter Snow.

Homer, 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

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 Six years of seining experience in Prince William sound on my uncle's boat and am a lifelong Cordova resident.

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,

Dariah Songer

[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



Southeast Alaska Fishermen's Alliance

1008 Fish Creek Rd

Juneau, AK 99801

Email: kathy@seafa.org

Cell Phone: 907-465-7666

Fax: 907-917-5470

Website: <http://www.seafa.org>

November 25, 2024

Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811

RE: Prince William Sound Board of Fish Proposal Comments

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

Southeast Alaska Fishermen's Alliance (SEAFA) is a non-profit commercial fishing association representing small boat multi-gear/multi-species fishermen. Our members are mainly involved in Southeast Alaska salmon, crab, shrimp and longline fisheries but we have members who are involved in Prince William Sound (PWS) salmon drift gillnetting and groundfish fisheries.

Proposal 6: SUPPORT

SEAFA supports proposal #6 that would allow the legal use for jig fishermen to release rockfish using approved deepwater release mechanisms. With ADF&G's concern over rockfish in PWS, this provides another opportunity to safely release rockfish as occurs in other fisheries.

Proposal 21 & 22: SUPPORT

SEAFA supports proposals 21 & 22 which would allow for the concurrent use of longline gear and groundfish pot gear in the PWS sablefish and Pacific Halibut fisheries. Adoption of this proposal helps with the issue of having both gear types on board when transiting PWS where currently you have to make sure one gear type is unloaded before switching to another fishery.

Proposal #23: COMMENT

SEAFA would point out that the current regulation has caused a lot of confusion and violations because the regulation is in a section of the book that a halibut fishermen would not normally have a reason to look thru.

Proposal #46: COMMENT

SEAFA supports all gear groups reporting their harvest of all species. This helps provide better data of the resources being harvested and utilized and for developing appropriate management tools for conservation of stocks as necessary for all gear groups.

Proposals 51, 52 & 53: OPPOSE

SEAFA opposes these proposals to reduce commercial salmon fishing opportunities in the Copper River District. These proposals restrict ADF&G's flexibility to manage the fishery based on in-season information. Current management allows for proportional representation of each segment of the run in the escapement, passage of these proposals would increase harvest on the later returning segments of the run.

Proposal #65: COMMENT

SEAFA supports accurate reporting for better management of the resource.

Proposal #78: OPPOSE

SEAFA opposes this proposal to reduce the current permitted capacity of pink and chum salmon eggs at each PWS Hatchery corporation. Similar proposals have been introduced each meeting for several cycles and have all been voted down. As ADF&G wrote in RC2 *Staff Comments page 200* regarding the Dept of Law Memo on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production (1997), the opinion noted that **"Board action that effectively revokes or prevents the issuance of a hatchery permit is probably not authorized."**


This proposal is suggesting revisions to 5AAC 24.370 Prince William Sound Management and Salmon Enhancement Allocation Plan which does not have any connection to egg take goals whether taking from the wild or from a built up broodstock source. 5AAC 24.370 is strictly an allocation plan between gear groups to provide a fair and equitable split of hatchery returns partially based on the amount of assessment tax paid by a gear group.

The framework for revising or developing a hatchery return is public and open but conducted through the Regional Planning Teams and not the Board of Fish process and was developed that way by the Alaska State Legislature in determining who has what authority for the various actions.

Adoption of this proposal would have extreme effects on the regional economy and all user groups as well as the economic viability of the PWS hatchery operations. Commercial fishermen targeting hatchery returns benefits wild stocks by taking the effort off them.

Thank you for your time and service on the Board of Fish and for your consideration of our positions on the above proposals. If you have any questions, please feel free to contact the office at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal flourish line.

Kathy Hansen
Executive Director



SSRAA
 Southern Southeast Regional Aquaculture Association, Inc.
 14 Borch Street, Ketchikan, Alaska 99901
 P: 907.225.9605 F: 907.225.1348

To: Alaska Board of Fisheries

RE: **Oppose Proposal 78, 5 AAC 24.370**

Prince William Sound Management and Salmon Enhancement Allocation Plan

Oppose Proposal 156, 5 AAC 33.364

Southeastern Alaska Area Enhanced Salmon Allocation Management Plan

Dear Chair Carlson-Van Dort and Board Members:

Thank you for the opportunity to comment on proposals 78 and 156, that you will be considering at the Cordova and Ketchikan meetings. Southern Southeast Regional Aquaculture Association, (SSRAA) is a regional non-profit salmon hatchery organization originally incorporated in 1976. SSRAA is governed by a 21-member board of directors who represent a cross section of regional salmon users, communities, and members of the public. SSRAA's mission statement is to ***“Enhance and rehabilitate salmon production in Southern Southeast Alaska to the optimum social and economic benefit of salmon users.”*** The SSRAA Board is adamantly opposed to both of these proposals for a myriad of reasons. I will touch on a few points, but will save most of my specific comments concerning proposal 156 for the Southeast and Yakutat Finfish and Shellfish meeting.

First, hatchery egg-take production is not set in regulation, it is permitted under AS16.10.400 – 16.10.470. The proponents' use of the regulations pertaining to the Enhanced Salmon Allocation Management Plans, reflect that there are no regulations for egg-takes, and this is the closest he could come to anything relevant. ***“The Board may not adopt any***

regulations or take any action regarding the issuance or denial of any permits required under AS16.10.400 – 16.10.470” (AS 16.10.440). Reducing hatchery egg-take capacity would essentially be denying a previously approved hatchery egg-take permit under AS16.10.400 – 16.10.470. **“Hatchery egg permitting authority resides with the Commissioner of Fish and Game ... under the restrictions imposed by statute or regulation under AS16.10.400 – 16.10.470”** (AS16.10.400). It is our opinion that these proposals should have been eliminated because they do not meet the criteria for consideration, or perhaps should have been re-directed to an appropriate forum.

Contrary to the proponents’ claims, 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. ADF&G Staff comments in RC2, pages 198 – 199, **Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp)**. December 10-16, 2024, outlines the four permitting documents issued by the Department. In addition to these, each region has a Comprehensive Salmon Enhancement Plan and Regional Planning Teams to guide and oversee their production. The assertion that this oversight is somehow tainted or inter-dependent is derogatory and inflammatory to the numerous departments and department personnel throughout the state responsible for this process.

Comments made in proposals 78 & 156 that the department is “consistently reluctant” to consider peer-reviewed research, disregards the extensive review of the literature that has been presented to the Board and to the public. Literature with speculative correlations, or detrimental effects found in other states or countries whose hatchery programs and oversight do not mirror the Alaskan model (and then used as evidence), and advocacy-based science; are a few examples of literature that should be closely examined before acknowledging its relevance. Using this type of research and insisting that it is evidence for hatchery reductions to solve isolated regional survival issues would be negligent. Draconian and capricious cuts to hatchery production will have known dire economic consequences, while there is no evidence there will be any conservation or other benefit.

The economic impact of a 25% reduction in chum production in Southeast Alaska to commercial fishermen alone, for just chum production, is estimated to be \$7.7 million dollars annually using the most recent ten-years of value data (Table 1).

Table 1.

Estimated Value of Enhanced Chum Salmon in Southeast Alaska *

Year	Common Property Value		% Enhanced	25% Reduction
	Enhanced	Total Value		
2024**	\$ 29,371,500	\$ 33,978,645	86%	\$ 7,342,875
2023	\$ 35,669,800	\$ 39,939,305	89%	\$ 8,917,450
2022	\$ 49,305,486	\$ 57,369,743	86%	\$ 12,326,372
2021	\$ 25,064,473	\$ 28,444,711	88%	\$ 6,266,118
2020	\$ 10,559,447	\$ 11,059,953	95%	\$ 2,639,862
2019	\$ 24,000,000	\$ 28,400,000	85%	\$ 6,000,000
2018	\$ 53,000,000	\$ 58,400,000	91%	\$ 13,250,000
2017	\$ 45,000,000	\$ 54,600,000	82%	\$ 11,250,000
2016	\$ 5,189,000	\$ 6,385,000	81%	\$ 1,297,250
2015	\$ 30,500,000	\$ 36,204,000	84%	\$ 7,625,000
Totals /AVE	\$ 307,659,706	\$ 354,781,357	87%	\$ 7,691,493

*Data from Alaska Salmon Fisheries Enhancement Annual Reports 2015-2023

** Preliminary Date from Operators

The values in Table 1 only take into account chum value to the commercial fleet. The added reduction to the value of coho and chinook to the commercial fleet, that chum production supports, will add to reduced revenues, this at a time when the Alaska's fishing industry is facing catastrophic challenges. Reduction in the Fisheries Business taxes would also negatively impact communities that rely on these monies to support services they provide.

Hatcheries are critical to ensuring that salmon remain accessible to all user groups, including sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests.

SSRAA's coho and chinook programs substantially contribute to the sport and sport charter industry in the Ketchikan, Prince of Wales, Petersburg, and Wrangell areas. Most of these

programs never pay for themselves, and none consistently have a neutral cost benefit ratio. The value to local economies and harvest numbers associated with these activities are not as well documented as the commercial values. SSRAA's most recent evaluation of this enhancement sector was done in 2018, using the previous 5-year average. To use this information and not expand for the dramatic increase in cruise ship visitors and the sport charter industry expansion would be speculative at best. Suffice to say, that if you have communication with any of these sectors in SE, you will hear the story first hand of the benefits and need for these programs to continue to not affect their personal harvest or client success.

The time and energy Board members put into educating themselves about the myriad of proposals that come before them, so they can make the best decisions, is daunting. Thank you for your service to the BOF, and please realize in researching these proposals, this is **NOT** the answer to the proponents' concerns.

Respectfully,



Susan Doherty

General Manager SSRAA

(907) 228-4389



Submitted by: Rita Spann

Community of Residence: Cordova, Alaska

Comment:

I'm an Area E drift permit holder and have been fishing in Prince William Sound for over 10 years.

I strongly support Proposals 47 and 48. In season reporting up and down the Copper River for all user groups is a very practical, common sense way to increase real time data so regional biologists can manage our shared resource as effectively as possible.

I oppose Proposals 51, 52 and 53. Every salmon season is different. These efforts to restrict commercial operations in the Copper River would limit regional biologist's ability to respond to run entry as it actually happens.

I strongly support Proposals 79, 80 and 81. Prioritizing the efficiency and safety of Main Bay hatchery cost recovery operations will improve their output of sockeye for all user groups.

I oppose Proposal 48. Commercial guide services undermine the spirit of Alaska's subsistence culture. Outlawing them was a huge win for all Alaskans in the last Board of Fish cycle.

2024 PRINCE WILLIAM SOUND COMMENTS

MARK SPENCER AK EXPEDITIONS

CHITINA, ALASKA

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

Support: 14, 16, 17, 48, 58, 59, 70

I am a dipnet charter operator on the Copper & Kenai Rivers, Registered Guide Outfitter, Big Game Transporter, Business Owner, Tribal Member of the Rose Bud Indian Reservation, Navy Veteran, Father, and husband. I am a native harvester of fish and game. I am an advocate for sportfish, personal use and subsistence access and opportunities for Alaskan families. I have attended nearly every board of fish meeting throughout the state for the past 5 years and have learned a lot about fisheries and how important it is to stand up and represent sportfish, personal use and subsistence users who cannot afford to attend long and often remote meetings or are otherwise perplexed by the complexity of Alaska Board Process. These users are underrepresented in these meetings and as such they are often taken advantage of. Looking back several cycles it becomes clear, Com Fish has a lot of time to write in river proposals that impact nearly exclusively personal use users and that is true again with this suite of proposals.

Please find my comments below on individual proposals below.

Commercial Groundfish			
14	Close the Prince William Sound walleye pollock pelagic trawl fishery	Public outcry is against this fishery	Support
16	Close the Prince William Sound pelagic trawl fishery	Public outcry is against this fishery	Support
17	Establish observer requirements in the Prince William Sound pelagic trawl fishery	Having an unbiased way to objectively observe commercial harvest is a great idea.	Support

Copper River Salmon - Subsistence (7 proposals)			
44	Allow more than the legal limit of gillnet gear to be onboard a vessel used in the subsistence salmon fishery	Having both types of gear onboard at the same time creates great difficulty in determining end use of fish as there are subsistence and commercial opportunity to be had in nearly the same harvest area.	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	Previously Proposed 2021 BOF Cordova Motion Failed (1/5) (Proposal 6 Require inseason reporting of subsistence, sport fish and personal use harvest and effort.) Previously Proposed 2023 BOF Statewide Motion Failed (0/6) (Proposal 167 Require inseason reporting of subsistence and personal use salmon harvest within 5 days of harvest.) There have been multiple iterations of this proposal and like others that have failed in the past are not necessary for in season management for established fishery objectives.	Oppose
47	Require in season reporting in subsistence and personal use fisheries	Previously Proposed 2021 BOF Cordova Motion Failed (1/5) (Proposal 6 Require inseason reporting of subsistence, sport fish and personal use harvest and effort.) Previously Proposed 2023 BOF Statewide Motion Failed (0/6) (Proposal 167 Require inseason reporting of subsistence and personal use salmon harvest within 5 days of harvest.) There have been multiple iterations of this proposal and like others that have failed in the past are not necessary for in season management for established fishery objectives.	Oppose

48	Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict 45	<p>Previously Proposed 2021 BOF Cordova Motion Carried (2/4) (Proposal 7 initially failed after substituted with language found in RC48 by a vote of 3-2-1 (Mitchell abstained). It was later brought up for reconsideration and carried after substituted with language found in RC100.) (PROPOSED BY: Shawn Gilman (EF-F20-070))</p> <p>Previously Proposed 2023 BOF Statewide Motion Carried (5/1) (Proposal 165 Prohibit guide services in subsistence fisheries) Public comments: Support: 38, Oppose 453. It is clear that the public has no interest in banning chartered access to subsistence finfish fisheries.</p> <p>Restricting access to a subsistence fishery without a biological reason but rather because some members found the practice distasteful is unacceptable and Alaskan's right to access should be restored.</p>	Support
49	Prohibit transport services in the Glennallen Subdistrict	<p>Previously Proposed 2021 BOF Cordova Motion Carried (2/4) (Proposal 7 initially failed after substituted with language found in RC48 by a vote of 3-2-1 (Mitchell abstained). It was later brought up for reconsideration and carried after substituted with language found in RC100.) (PROPOSED BY: Shawn Gilman (EF-F20-070))</p> <p>Lauded at 2021 Cordova meeting was the successful ban of guided charters in the Glennallen Subdistrict successfully banning Alaskan residents means of access to a subsistence resource with no biological concern. Commercially Transporting residents into this fishery was expressly intended as provided in the substitute language (RC100) that was adopted by the board at that time. It was the intent of the board (some board members) that they were NOT restricting access to residents BECAUSE they still would still be ALLOWING "Reasonable opportunity" to access to this fishery via commercial transporter.</p> <p>The proposer took part in reconsideration of Proposal 7 and worked with board members and the department to draft substitute language. With this latest proposal it seems they hope to take another bite at the apple further restricting opportunity for Alaskan family's constitutional right to reasonable access a subsistence fishery.</p> <p>Audio from Board Meeting: 12/05/21 - 1:04:23 @10:48:18am</p> <p>https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2021-2022/pws21/index.html?mediaBasePath=/Meeting%2012-05-21%20%28Dec-05-21%205-28-43%20PM%29#</p>	Oppose
50	Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts	<p>Previously Proposed 2021 BOF Cordova MOTION FAILED (0/6) (PROPOSED BY: Kirk Wilson (EF-F20-014), Copper Basin Fish and Game Advisory Committee (EF-F20-033), Karen Linnell (EF-F20-121)</p> <p>The use of sonar while navigating any body of water is so prolific that nearly every vessel and certainly every commercial fishing boat employ sonar, sounders, aerial spotters, and other means effectively to navigate and to locate fish. Though unlike our commercial counterparts, using sonar on the Copper River is more an aide to navigation than to find fish as there are limited stretches of the river that are suitable for drifting with dipnets and those drifts are well known. This is in large part because the depth in those areas is shallow enough and significantly free of snags that allows dipnetters to float their nets near the bottom without snagging.</p> <p>The biggest risk of injury or accident while gear is deployed is the reality of snagging submerged objects or structure unseen without the use of sonar. Dipnetters have been pulled into the water after hanging up on a snag. This is extremely dangerous. Debris such as logs, large rocks, lost dipnets and broken fishwheels get pushed down river resulting in a constant risk of fouling. Shifting gravel bars change location daily as the river floods and the sonar plays a pivotal role in avoiding these unseen underwater hazards. Each season emergency services are dispatched to rescue boaters who have run aground in the Personal Use Fishery due to the constantly changing conditions.</p> <p>In discussing this proposal with Senior Marine Inspector MSSE4 Overturf from USCG Sector Anchorage he stated "while it's rare to find a fishing vessel without depth sounding device, most vessels have them as the added safety for the navigation of the vessel cannot be denied."</p>	Oppose
Salmon Management Plans (5 proposals)			
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
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
53	Allow the Copper River District commercial salmon fishery to open for	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023.	Support

	the first two periods, then close until the Copper River cumulative salmon management objective is met		
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	Charters provide Alaskan residents a safe, and reliable means of access to this fishery. Implementation of this proposal would have no effect on ability to manage for established in river goal objectives.	Oppose
Personal Use (14 proposals)			
58	Amend the Copper River King Salmon Management Plan	DFG Staff Proposal	Support
59	Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan	DFG Staff Proposal	Support
60	Modify the annual limit for the Chitina Subdistrict	This is simply an effort to reduce bag limits for Alaskan families in hopes of making the long trip to this fishery not worth the time and effort.	Oppose
61	Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict	This is simply an effort to reduce bag limits for Alaskan families in hopes of making the long trip to this fishery not worth the time and effort.	Oppose
62	Allow in season adjustment of the Copper River personal use maximum harvest level	Reduces bag limit.	Oppose
63	Amend the opening date of the Chitina Subdistrict personal use fishery	Restrict PU fishery for "genetic diversity" . We would rather see commercial fishery shut down for the first 6 periods to achieve this proposal putting the burden on the fishery that harvests the vast majority of the early run.	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	As a charter operator arguably releasing tons of kings safely every season, it is near impossible to maintain control of a king in a net while the net is submerged. We agree kings should not be pulled into boat or up a steep and slippery bank but the user needs to see the fish to determine the best way to untangle it. Whether from a boat, on shore or on a rock face, each location has a specific set of difficulties in removing kings from nets and would be complicated by this proposal undoubtedly resulting in higher king mortality as users struggled with releasing a thrashing king in a submerged net.	Oppose
68	Prohibit dip netting from a boat in the Chitina Subdistrict	Boats provide Alaskan residents a safe, and reliable means of access to this fishery. Implementation of this proposal would have no effect on ability to manage for established in river goal objectives Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given a 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 a priority in statute.	Oppose
70	Extend the lower boundary of the Chitina Subdistrict	This proposal will reduce the end of drift traffic jam that stops all dipnetting in an area of the river that acts as a 5 lane hwy that merges to a single lane at the current line. Moving it as proposed allows a large and safe exit from the now traffic jam allowing users to "peel out and back up river" more safely. Boaters will not be forced to get on step threading the needle through boats stacking up at the end of a drift. Every season there are accidents where boater collide with other boaters at this location. I have been hit a handful of times by other boaters in at this location over the years.	Support
71	Prohibit guiding in the Chitina Subdistrict	<p>Previously Proposed 2023 BOF Statewide No Action (<i>Proposal 163 prohibit guiding in finfish fisheries</i>) <i>PROPOSER WITHDREW PROPOSAL. Public Comments in support: 32, Comments in Opposition: 499. It is clear that the public has no interest in banning chartered access to personal use finfish fisheries.</i></p> <p>Experienced transporters and guides have provided safe and reliable access to Alaskan residents for over 30 years. As of 2024 there are 4 charter / transport operators providing access services to the PU fishery for fellow Alaskans. This is not a new and budding industry and its operators have been stable over the past three decades going from 2 operators to 4 operators in the past decade. This fact bears out in the data collected by the department on how many permittees use charter services.</p> <p>It is undeniable that Charters provide Alaskan residents a safe, and reliable means of access to this fishery that simply provides access fish to which they are given a priority in statute.</p>	Oppose

Sport (1 proposal)			
72	Close sport fishing for salmon based on water temperature in the Gulkana River	Unprecedented in Alaska this proposal would be impractical to implement.	Oppose

Submitted by: Tracy spencer

Community of Residence: Vancouver Washington

Comment:

It is time to end the Trawling scheme of improper reporting of bycatch.

They are dragging the bottom and killing everything they come in contact with.

Besides releasing mass amounts of carbon dioxide in the ozone.

Since it is still the wild wild west of fishing practices, its time to find a new way

to catch a single species. Trawling is indiscriminate and has devastated the crab, salmon, steelhead, whales, and many other species. It will cause the extinction of all of the above.

Submitted by: Jeffrey Sperry

Community of Residence: Eagle River

Comment:

Proposal 44 - I am opposed. We should not allow more than the legal limit of gear on board a vessel. This just allows the opportunity to fish with more than the legal limit of gear.

Proposal 45 - I am opposed. If we are restricted commercial and sport fisheries for king salmon then subsistence fishing for king salmon should also be restricted.

Proposal 46 and 47 - I support this proposal. Timely reporting of subsistence harvest can provide valuable information about the run strength and help with monitoring the salmon run.

Proposal 48 - I am opposed. Monetary payment for guide services should not be a part of the subsistence process.

Proposal 49 - I support. Monetary payment for guide services should not be a part of the subsistence process.

Proposal 50 - I am opposed. The use of fish finders, depth finders, etc also help with safety in navigating on rivers. These should be allowed.

Submitted by: Jeffrey Sperry

Community of Residence: Eagle River

Comment:

Proposal 58 & 59 - support. If the projected escapement will exceed the goal, it is prudent to increase the allowed catch of fish.

Proposal 60 & 61 - oppose. All have the opportunity to participate in the personal use fishery. ADF&G can close the fishery at any time if needed.

Proposals 62 & 63 - oppose. ADF&G can manage the fishery with openings & closings as dictated by the strength of the run.

Proposal 64 - recommend amending the proposal to combine Cook Inlet & Copper River into one permit (at the current copper river price) Require weekly report of catch by area. many families get both permits, catch the max. & ship the salmon out of alaska to relatives.

Proposal 65 - I oppose - see rec. of proposal 64.

Proposal 68 & 69 I oppose. Many individuals cannot operate a dipnet with a 30 foot handle as is needed in many shore areas. Using a boat increases safety by keeping people out of the water. Copper River is dangerous & people are at risk of tragedy if standing in the water

Submitted by: Jeffrey Sperry

Community of Residence: Eagle River

Comment:

Proposal 71 - oppose - allowing people to utilize a guide in a boat promotes safety for individuals on a very dangerous river.

Proposal 78 - support. the production of pink salmon should be decreased. there is a correlation between the increase in pink salmon and the decrease in red, silver, and king salmon in south central alaska. By decreasing the production of pink salmon we can hopefully increase the return of the other species of salmon

Submitted by: Terry Spessard

Community of Residence: Anchorage

Comment:

Stop trawling in PWS till proof there's no harm to ocean floor.

In all alaska waters for that matter.

BOF Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) Meeting December 10 - 16, 2024 comments by Jake Sprankle, Fairbanks, Alaska,

Proposal 48 SUPPORT. Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict. Subsistence users and Personal use users should not be limited by limiting access to commercial services. People are trying to feed their families with their fish from their rivers. Make it easier, not harder.

Proposal 49 OPPOSE; Prohibit transport services in the Glennallen Subdistrict. See above in 48

Proposal 50: OPPOSE: Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts. Fair chase is not an issue. This is harvesting our resources to feed our families. Stop trying to make it harder on people just trying to feed their families.

Proposal 51,52, 53: SUPPORT

Proposal 58: SUPPORT Amend the Copper River king salmon management plan. The Copper River king salmon escapement goal is 21,000-31,000. Previously this escapement goal had no upper bound and no mechanism existed for the F&G commissioner to raise the king salmon bag limit for the Chitina Personal Use Dipnet Fishery (CPUDF). If in the future, the Copper River king escapement is predicted to pass the 31,000 upper bound, this proposal could allow harvest of more than the one king permitted in the dipnetter bag limit. We used to be able to harvest 5 kings per household. That's about 100 pounds of meat. We are trying to feed our families—the highest and best use of our fish.

Proposal 59: – SUPPORT Allow the commissioner to increase the CPUDF sockeye salmon bag limit if the Copper River sockeye salmon escapement goal will be exceeded.

Proposal 60 – STRONGLY OPPOSE Reduce the CPUDF household annual bag limit. The existing CPUDF annual bag limit is 25 salmon for the permit holder and 10 salmon for each additional household dependent. This annual bag limit was passed by the BOF during the 2014 PWS/Upper Copper finfish meeting for reasons it standardized the PU dipnet salmon bag limit between the Chitina PU fishery and the South Central Alaska PU dipnet fishery. It also made the bag limit more equitable for larger families. Since the CPUDF is managed by actual sonar counts the new bag limit was considered sustainable. Some families are very large and 25/10 salmon are not enough fish. 55 salmon for a family of 4 is only 13.75 fish per person for the ENTIRE YEAR. That's roughly ONE salmon per month plus change per person. We should be INCREASING bag limits, not reducing them. This is our FOOD and the highest and best use of our fishery resources is FEEDING ALASKANS!

Proposal 61: STRONGLY OPPOSE Reduce the CPUDF annual household bag limit and add supplemental periods. See above proposal 60 comments. Supplemental periods were done away with when the 2014 BOF passed the existing CPUDF bag limit. We should be INCREASING the personal use harvest limits, not decreasing.

Proposal 62: STRONGLY OPPOSE Allow inseason adjustment of the Copper River personal use maximum harvest level. Author writes that conservation measures should be shared EQUITABLY! Personal Use and Subsistence fishermen take a FRACTION of the harvest commercial fishermen

take. We are feeding our families. Stop trying to limit our food resources. Commercial (MONEY) fishermen should take on any necessary conservation measures.

Proposal 63: OPPOSE Change the opening date of the Chitina Personal Use Dipnet Fishery from June 7-15 to June 21. Change the commercial openers to June 21 instead. That will solve the problem the author writes regarding genetic diversity in the fishery.

Proposal 64: OPPOSE Prohibit a household from possessing permits for multiple personal use salmon fisheries. This is a poorly thought-out proposal. If enacted, it will put more pressure on the Copper River fishery, not less. What is the author's end goal? To limit Alaskans access to their food? Some families are very large and 25/10 salmon are not enough fish. 55 salmon for a family of 4 is only 13.75 fish per person for the ENTIRE YEAR. That's roughly ONE salmon per month plus change per person. That is too low of an allocation and harvest levels should be raised across ALL personal use fisheries.

Proposal 65: OPPOSE Require weekly harvest reporting in the CPUDF. F&G staff comments, have consistently opposed these proposals on the premise that it would place undo burden on P.U. dipnetters and that weekly reporting is not needed and would not be used for management of the CPUDF. The fishery is managed by actual sonar count passage.

Proposal 66: OPPOSE Manage the CPUDF to achieve the Gulkana Hatchery broodstock goal. Reducing fishing time when supposedly Gulkana salmon are passing through the dipnet fishery will only reduce opportunity for Alaska state residents to harvest Copper River salmon to feed their families and due to the mix of salmon stocks, not guarantee more fish will make it to the hatchery. If the authors are sincerely worried about hatchery broodstock, they can delay opening of commercial openers or reduce harvest and fishing times available to commercially fish.

Proposal 67: OPPOSE Prohibit removing king salmon from the water if it is to be released in the CPUDF. Author has obviously never fished the Copper River Dipnet fishery, because this is rarely possible, especially if fishing from the bank in the canyon and not a boat. It is preferred, however, and dipnetters try to release chinook as gently as possible. We care greatly about the resource and would like to see stocks get to levels seen in the past, especially when harvest limits were 5 kings per household and not one, or most times, none. Delayed commercial openers would greatly help in getting stock levels back to where they were in the 1990's and early 2000's.

Proposal 68: OPPOSE Prohibit dipnetting from a boat in the Chitina Subdistrict. This proposal is nonsensical. Just say you don't want to people to catch any fish whatsoever and want them all to yourself. Let's ban commercial fishing from boats then too. I don't even own a boat that could run the Copper but this would affect all shore fishermen greatly. Spreading people out is better. People are trying to feed their families, not make a nickel. Let them harvest their fish as efficiently as possible.

Proposal 69: OPPOSE Place restrictions on dipnetting from a boat. Again, this is nonsensical. People are trying to feed their families, not make a nickel. Let them harvest their fish as efficiently as possible.

Proposal 70: SUPPORT Extend the lower boundary of the Chitina Subdistrict. Spreading people out along the river is better for everyone.

Proposal 71: OPPOSE Prohibit guiding in the Chitina Subdistrict. This is just a mean spirited proposal trying to limit people's access to their fishery resource. To be clear, I will never use a guide or hire commercial services to fish the Copper River fishery but not everyone has access to boats or four wheelers or other equipment needed to dipnet this fishery. People are trying to feed their families with a high protein food resource that that they catch themselves. Prohibiting them from hiring commercial services that would help them achieve that goal is wrong on many fronts. We shouldn't be disenfranchising Alaskan residents access to their resources, we should be encouraging it. I would also encourage the authors of this proposal to consider exploring entering the guiding business themselves or assisting community members in getting involved in the guiding business. There's financial and employment opportunities available here.

Jake Sprankle

Submitted by: Kent STEPANEE

Community of Residence: East Bethel, MN

Comment:

I am against any new proposals and rules coming onto sport fishermen especially further limiting the area and time in which we can fish. We are already limited by any current regulations compared to commercial fishermen. The sport fishing harvest is a drop in the bucket compared to commercial harvesting.

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

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 started crewing on a gillnetter in 2004. My family has been based out of Cordova since the 60's, with multiple family members being issued original issue permits. Ive been gillnetting on the copper river for 15 years with my own operation.

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,

Jack Stevenson

A black rectangular redaction box covering the signature of Jack Stevenson.

Cordova

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE 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 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

Submitted by: Patrick Stockton

Community of Residence: Portland, OR

Comment:

I support Props 14, 15, 16 and 17

Submitted by: James Stone

Community of Residence: Chugiak, AK

Comment:

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

Submitted by: James Stone

Community of Residence: Chugiak, AK

Comment:

Approve - 83, 85, 86, 87, 88, 90

Reject - 84, 89

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 crewman involved in a seine operation. Hatcheries have allowed me to make money not many other places can provide. Proposal 78 would result in a 25% decrease in opportunity to provide, to earn, and for vessel owners to reinvest in their operations such as nets, skiffs, and maintenance.

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,

Micah Stone

A solid black rectangular box used to redact the signature of Micah Stone.

Cordova, Alaska

Submitted by: Ivan Stonorov

Community of Residence: Homer

Comment:

To the State of alaska board of fisheries.

I oppose proposals 75, 76, and 77

I do not support any changes to the Management plan for enhanced fish in PWS. The VFDA and Gulkana should not be included in the management plan. Both gear groups suffer when Chalmers is allocated to either the drift fleet or the seine fleet. There is very limited opportunity in June for seiners, by reallocating more fish to the drifters seiners would have very limited opportunity to fish in June.

Submitted by: Ivan Stonorov

Community of Residence: Homer

Comment:

I strongly support proposal 17 that would require 100% onboard electronic observation and physical onboard observers on a vessel during fishing operations. I think that it is ridiculous that this is not already happening. I have been a commercial fisherman for many years and involved in many fisheries, I have seen first hand that under reporting of bycatch can be a issue. Instead of 50% physical observers I would propose 20% physical because this would not put such a financial burden on the fisherman.

Submitted by: Ivan Stonorov

Community of Residence: Homer Alaska

Comment:

see attached

To the Alaska Board of Fisheries,

I am writing to you because I oppose, the commercial fin fish Proposal #78.

The hatchery program is one of the most successful non-profit organizations in Alaska. Since the creation of the hatchery program more than 50 years ago, it has provided a sustainable source of food, employment and sport fishing opportunity for thousands of people, many of whom are Alaskans. The quantity of smolt put out by the Alaskan hatchery system has basically remained constant since 1988. Salmon hatcheries have produced many generations of salmon with robust returns to different regions of the state. These returns have secured the livelihood of many fishermen involved in the harvest and go on to provide food security on a local and national level. Any disruptions to the hatchery production of salmon would have severe consequences on the Alaskan economy and national food security.

There are several new scientific papers and news articles about the possibility that hatcheries are having a negative effect on wild salmon stocks. I have read many of these articles and papers, some of which do have some valid points, but I have yet to read anything that has any conclusive scientific data linked directly to hatcheries. My response to these articles and scientific papers is that salmon populations fluctuate depending on the year and that observed changes are part of a natural cycle. Salmon populations usually follow an even odd year cycle but can be greatly influenced by climate change or El Nino and La Nina weather patterns. One must remember that salmon spend different amounts of time in the ocean, Cook Inlet and Copper River enjoyed robust returns of sockeye in 2024 but it was one of the poorest pink salmon returns in the same region in recent memory. I would expect the possibility of some poor sockeye returns in the coming years for this region because all out migrating salmon smolt met the same ocean conditions as the pink salmon that had poor returns in 2024.

Climate change is a huge factor in population changes that we are seeing. Pink salmon, black cod, dungeness crab and pollock all

seem to be species that are responding well to recent changes in the climate. Other species cod, king salmon and opilio crab don't seem to be faring so well. Chinook salmon may be greatly affected by climate change because of the long time they spend in the ocean and their large body weight. They require lots of feed and their metabolisms are probably increased by warmer temperatures thus greatly affecting their health and access to food. Some researchers are looking at salmon scale samples from the last 20 years and documenting a pattern of slower growth in chinook and other salmon as well as other marine species when there are high pink salmon numbers. Hatcheries produce around 15% of the pink salmon harvest and about 10% of the overall salmon harvest in Alaska. It seems unlikely that hatcheries are the cause of larger than normal pink salmon returns when they only represent 10% of the total salmon run. That being said, there are also many other reasons why some of these salmon species are experiencing low returns. These include, environmental and human caused reasons, such as, poor commercial fishing management and practices like sport fishing on spawning beds and trawling in the open ocean. Additionally, warmer temperatures in the rivers and lakes as a result of climate change can have an effect on salmon fry survival.

Hatcheries provide stability in the sport and commercial fisheries throughout the state of Alaska. 28 percent of the total ex-vessel value of Alaska commercial salmon catches are produced by hatcheries. This adds up to be around 150-130 million dollars worth of fish every year. A majority of these profits support local fishing families and go directly back into Alaskan communities. Further, as I travel around the state I witness many sport fishermen and supporting businesses enjoying the benefits of hatchery production. There have been hatcheries operating in Alaska for more than 50 years, producing many generations of salmon. The hatcheries have not changed but the climate is changing. When we talk about hatcheries and their long term impacts, we must pay attention to real scientific data and make educated conclusions that will benefit all Alaskans.

Ivan Stonorov

Lifelong Alaskan, commercial and sport fisherman.

Currently a PWS Seiner, GOA cod and Kodiak tanner commercial fisherman, and an avid sport fisherman.

Submitted by: Dean Strunk

Community of Residence: Anchorage

Comment:

I praise your proposals and efforts The damage of bottom trawls is not only the sea bottom but also the bycatch is horrendous

The library was hidden the archives That show the previous bycatches

Everyone needs to see those statistics it's mind blowing

Submitted by: Ray Sutton

Community of Residence: Valdez

Comment:

As a third generation salmon seiner out of Valdez, I am strongly opposed to proposal #78.

Pink salmon, especially hatchery pinks, has been essential to my livelihood for over 30 years. If the hatcheries have to cut back by 25% their egg take it makes it even more likely that we will not have common property openers because all the fish will be taken for cost recovery. We have already seen this happen on weak years and this will obviously exacerbate the problem. I'm sure the hatcheries won't be able to cut anywhere near 25% of their budgets to operate. This seems like a proposal to make hatcheries unsustainable so they fold on their own.

Steven Swartzbart
208 S Second Street
Cordova, AK 99574

I am a second generation Area E commercial drift gillnet fisherman. I have been fishing my whole life and it is my primary income. I also participate in sport and subsistence fisheries. Many of these proposals that will impact my livelihood and community. I am grateful for the public process that gives me the opportunity to have my voice heard.

Proposal 1, 25, 26- Oppose

The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. There are already viable ways for anglers to catch sablefish.

Proposal 2- Support

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.

Proposal 3- Support

This will increase opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch.

Proposal 5- Oppose

Commercial rockfish harvest is not consistently exceeding its GHL. In the last ten years commercial harvests are below the GHL. 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.

Proposal 6- Support

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.

Proposal 19, 20- Support

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.

Proposal 22- Support

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.

Proposal 27- Support

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 rockfish are being caught over and over again. I support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

Proposal 46, 47- Support

Many subsistence user go fishing in the copper river district when the commercial fishery is closed. The number of fish and the area where subsistence fish are caught is extremely valuable information. It is even more valuable when the commercial fishery is closed and managers have little information on the ambience of fish moving through the district. Local managers use data to manage all fisheries and they need as much as possible. 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.

Proposal 51, 52, 53- Oppose

These three proposals would have devastating impacts on the health of the Copper River salmon run and all its users. There is the very real possibility for gross over escapement. These proposals delay the commercial fishery until a certain number of fish are counted at the sonar. Between delaying the fishery and the up to 10 days it takes for the fish to reach the sonar, it will put commercial harvest weeks behind the run. This will place unprecedented harvest pressure on later stocks. At the same time possibly over escaping earlier stocks. Currently harvest opportunities are evenly spaced out. This is also beneficial for spawning escapement that makes up all different stocks of the run.

Forcing local managers to change their management plan drastically will make a challenging job impossible. The historic data of harvest and run timing to understand the strength of the run will become irrelevant and force local managers to start from scratch. These proposals go against the scientific approach to management that have made wild Alaska salmon runs the most sustainable and productive in the world.

The economic consequences of these proposals would be significant. This is the time of year when the price of salmon is high and markets are hungry for salmon. These proposals do not “simply move back” or “delay” the commercial fishery, because the salmon are constantly on the move up the river. Any lost time is lost opportunity and that why these proposals are allocative.

The primary concern that these proposals are attempting to protect is early stocks. The department has already proven to protect these early stocks aggressively by closing commercial fishing in the early season for extended periods. The daily and cumulative

escapement goals are goals for a reason, and don't account for the variation on run timing that changes season to season. ADFG has proven to manage the Copper River salmon run for sustainability and productivity, they use decades of data and experience. Tying the hands of local managers is not going to benefit the copper river salmon run.

Proposal 55- Support

The commercial fleet has taken on the burden of conservation with reduced time and area in very impactful ways. The commercial fishery has completely changed. The efforts to keep the Copper River sustainable should be spread across the different user groups.

Proposal 56, 57 - Support

The price of Copper River Drift permits is at an all time low. They were at \$240,000 less than 10 years ago and now they have recently sold for \$60,000 to \$70,000. Adjusted for inflation since 1985 that is only \$22,000. The price of permits is a good indicator of the financial viability of the fishery. This would be a good opportunity for a fleet funded by back program rather than funded by the state. Many other salmon fisheries across the state have done this. This will reduce the amount of nets in the water and create more opportunity for every fisherman. It will make the struggling fishery more financially viable without taking more fish.

Passing these proposals so that one person could fish two permits makes sense for the nature of the Area E drift gill net fishery. Many of the boats fish with a single person and with no crew. The season is very long and goes from mid May to the end of September. There are long gaps in fishing where keeping a crew person/permit holder around is not financially viable for the captain and especially the crew.

Proposal 58- Oppose

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

Proposal 59- Oppose

This proposal is allocative. It allocates fish that were over escaped past the commercial fishery and gives personal use more fish.

Proposal 60, 61- Support

There is no limits on the number of participants who can enter the personal use fishery. As the number of participants grows there should be limitations on the total fish harvested to ensure harvest guidelines are not exceeded.

Proposal 62- Support

This proposal will help share conservation efforts across different user groups. It will ensure conservation of salmon on years of low return. There are situations where the

commercial does not fish at all and the person use fishery sees absolutely no restrictions. I encourage the board to ask ADFG about these situations and discuss if that's fair.

Proposal 64- Support

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.

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. In season reporting will increase the accuracy of harvest reports.

Proposal 66- Support

Prince William Sound Aquaculture has not met their broodstock goal for the Gulkana hatchery for the 8 most recent years. This is very concerning for the sustainability of the Gulkana run. This regulation will be in align with other hatcheries in the region.

Proposal 67- Support

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

Proposal 68,69- Support

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 boat charters.

Proposal 70- Oppose

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. This will only give more opportunity to a fishery that is exceeding its allocation.

Proposal 71- Support

This will help limit the increased commercialization of the personal use fishery. Paying for salmon is not the intention of a personal use fishery.

Proposal 75, 76, 77- Support

The 5 year rolling average in the way the allocation plan is currently structured has not equally benefited the drift and seine fleets. It has not been revised since 2006 and there is strong evidence to show that it needs to be updated to reflect the allocation plans original intent.

Proposal 78- Oppose

Previous boards of fish have not passed similar proposals to this one because its not evidence based. Hatcheries have huge economic benefits and relieve pressure on wild stocks, especially when wild fish stocks are low. These anti-hatchery proposals continually have been proposed and rejected by previous boards of fish for good reason.

Proposal 80- Support

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. One small whole in the barrier seine can lead to a disaster because of so many fish escaping. It also usually requires a person to use dive gear to fix it. 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.

Proposal 85- Oppose

This proposal is obviously written for personal financial gain and theres no evidence there is sustainable opportunity to take double the amount of fish. This will also lead to an enforcement problem because boats traveling between North Gulf Coast and PWS waters.

Proposal 86- Support

Ibeck Creek gets a lot of pressure because its the easiest location in Cordova to access sport silver salmon fishing. This proposal will help ensure salmon are able to spawn with out reducing peoples ability to catch silvers.

Proposal 88- Support

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.

Proposal 96,97,98,99,100,102- Support

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species.

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 Valdez, Alaska, and I am a lifelong sports fisherman who manages maritime support facilities in the Prince William Sound Region. I am writing to express my strong opposition to Proposal 78, which seeks to reduce pink and chum salmon hatchery production in Prince William Sound by 25%. This proposal, scheduled for review at your upcoming meeting in Cordova this December, threatens the lifeblood of our community, our local economy, and the delicate balance of sustainable fisheries that benefit all Alaskans.

As an Alaskan resident and a stakeholder in the vitality of our fisheries, I am deeply concerned about the profound economic and social ramifications this proposal would have. Hatcheries are not merely an auxiliary component of our fisheries; they are a critical backbone. They enhance salmon returns, ensure the stability of salmon availability, and support a wide range of user groups, including subsistence harvesters, personal-use fishers, sport anglers, and commercial fishermen. A 25% reduction in hatchery production would directly undermine these benefits and jeopardize the livelihoods of countless Alaskans.

The economic impact of this proposed reduction cannot be overstated. Commercial fishermen, who rely heavily on hatchery-boosted salmon stocks, would bear the brunt of this decision. A 25% reduction in production equates to a significant decrease in the volume of salmon available for harvest, leading to an estimated 25% or more reduction in revenue. For a commercial fishing family, this is not just a financial inconvenience—it is the difference between survival and insolvency. Lower revenues ripple through the local economy, affecting not just fishermen but also processors, suppliers, and small businesses that depend on the spending power of our fishing community.

In Prince William Sound, where fishing is a primary economic driver, this proposal poses a direct threat to our way of life. The annual salmon runs draw workers, tourists, and economic activity to our region, sustaining jobs and fostering a sense of community. Reducing hatchery production undermines these benefits, risking an economic contraction that would harm everyone from fishery workers to schoolteachers whose salaries are indirectly supported by a thriving fishing industry.

Moreover, the sustainability of both hatchery and wild salmon stocks must be considered holistically. Hatcheries were established to bolster salmon runs and ensure the availability of this critical resource. They provide a buffer against the unpredictability of wild stock returns, which can be impacted by environmental changes, predation, and other variables beyond our control. A

reduction in hatchery production threatens to destabilize this delicate balance, leading to increased pressure on wild stocks and potentially creating conflict among user groups competing for a smaller resource pool.

Proposal 78 also fails to account for the historical success of hatchery programs in Prince William Sound. Hatchery-supported fisheries have consistently proven their value, providing economic stability while maintaining responsible and sustainable practices. The suggestion that reducing hatchery production will benefit wild stocks is speculative at best and ignores decades of research and management efforts that demonstrate otherwise.

In conclusion, I urge the Alaska Board of Fisheries to reject Proposal 78. The stakes are too high for our fishermen, families, and communities to risk such a significant reduction in hatchery production. Instead, I encourage the board to focus on collaborative solutions that support both wild and hatchery salmon stocks while sustaining the economic and cultural heritage that our fisheries provide.

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.

Thank you for your time and careful consideration of this critical issue. I look forward to your decision, which I trust will prioritize the needs and voices of Alaskans who depend on our fisheries for their livelihoods and way of life.

Sincerely,

Jeremy Talbott



Valdez & Prince William Sound, Alaska

Submitted by: Dustin Tallman

Community of Residence: Wasilla

Comment:

I support proposals 48,51,52,53,58,59 & 70

I'm opposed to proposals 44,45,46,49,50,54,55,56,57,60,61,62,63,64,66,66,67,68,69 & 70

Submitted by: Kade Taylor

Community of Residence: Wasilla

Comment:

My family has a cabin near Cameron Cove on Louise and I'm fishing Lake Louise roughly 30 weekends every year.

Submitted by: Lee Terry

Community of Residence: Anchorage

Comment:

In my opinion, I am opposed to this decision because of the location of the lake on the road system,^[OBJ] only one study conducted, there has already been a crash, an increase in social media, new technologies to catch fish, commercialization of the lake and many more.

At the end of the day, it comes down to no reason to increase the limit. Let's not be greedy!

To OPPOSE PROPOSAL 89

Chitina Dipnetters Association

Public Comments Concerning Submitted Proposals To The December 2024 PWS/Upper Copper and Upper Susitna Finfish and Shellfish BOF Meeting

Prop. 58 – support

Amend the Copper River king salmon management plan

The Copper River king salmon escapement goal is 21,000-31,000. Previously this escapement goal had no upper bound and no mechanism existed for the F&G commissioner to raise the king salmon bag limit for the Chitina Personal Use Dipnet Fishery (CPUDF). If in the future the Copper River king escapement is predicted to pass the 31,000 upper bound, this proposal could allow harvest of more than the one king permitted in the dipnetter bag limit. Something the Chitina Dipnetters Association (CDA) has been for years advocating.

Prop. 59 – support

Allow the commissioner to increase the CPUDF sockeye salmon bag limit if the Copper River sockeye salmon escapement goal will be exceeded.

Prop. 60 – oppose

Reduce the CPUDF household annual bag limit

The existing CPUDF annual bag limit is 25 salmon for the permit holder and 10 salmon for each additional household dependent. This annual bag limit was passed by the BOF during the 2014 PWS/Upper Copper finfish meeting for reasons it standardized the PU dipnet salmon bag limit between the Chitina PU fishery and the South Central Alaska PU dipnet fishery. It also made the bag limit more equitable for larger families. Since the CPUDF is managed by actual sonar counts the new bag limit was considered sustainable.

Prop. 61 – oppose

Reduce the CPUDF annual household bag limit and add supplemental periods.

See comments for proposal 60. Supplemental periods were done away with when the 2014 BOF passed the existing CPUDF bag limit.

Prop. 62 – oppose

Reduce the CPUDF maximum harvest level of 100,000 – 150,000 to 50,000 if the Copper River District commercial drift gillnet fishery is closed for 13 or more consecutive days.

This regulation was on the books until the BOF at their 2017 meeting repealed it at the request of a Chitina Dipnetters Assn. (CDA) proposal. The PU dipnet fishery opening and closing are based solely off of the sonar count passage numbers. When commercial fishermen are restricted because of low run numbers, those low numbers will show as low sonar counts, triggering closures in the dipnet fishery. To require that the PU dipnet fishery salmon allocation drop from 150,000 to 50,000 just because the commercial fleet has been restricted for 13 consecutive days, is asking the CPUDF fishery to bear two restrictions, first less fishing time due to low salmon sonar counts and second severe allocation reduction. This is unjustifiable. This allocation reduction would be for the remaining dip net season even though run numbers may rebound soon after.

The Copper River District drift gill net fishery is a mixed stock fishery. In recent years fishing times have been severely restricted in this fishery due to a poor king salmon run and the low survival rate of king salmon released from drift gill nets. This restriction due to low king number could trigger a 13 consecutive day closure and cause the reduction of the CPUDF salmon allocation to 50,000 salmon. Penalizing the CPUDF, where king salmon can be safely released from dipnets, would mean dipnetters would lose the opportunity to harvest sockeye salmon.

Prop. 63 – oppose

Change the opening date of the Chitina Personal Use Dipnet Fishery from June 7-15 to June 21.

The crux of this proposal is protection of the early upper Copper River salmon stock. The CPUDF management is abundance based using actual salmon sonar count numbers and passage of the upper Copper River stock is already taken into account when designating fishing time for the CPUDF. In the early 2000's the opening date for the CPUDF was changed from June 1 to June 7-15. This delay was to give the early upper Copper king salmon stock an extra 1-2 weeks to pass through that fishery unhindered. CPUDF users are allowed only 1 king salmon in their annual bag limit. According to F&G 2005-2009 radio telemetry data, by June 15, 60% of the upper Copper salmon stock has already passed through the CPUDF (**see attachment A**). During the week of June 7-15 there are 6 individual Copper River salmon stocks moving through the CPUDF, one of which is the upper Copper stock (**see attachment A**). From 2015-2023 the CPUDF averaged a 14% harvest of the total salmon sonar count attributed for that dipnetting fishing week (**see attachment B**). This 14% is spread over 6 different Copper salmon stocks. The number of upper Copper salmon saved by delaying the CPUDF opening date to June 21 would be insignificant.

In the last ten years, the number of Glennallen Subdistrict issued dipnet subsistence permits has greatly increased. As more restrictions are placed on the CPUDF, many of

these users have moved to the upriver subsistence fishery where fishing time is continuous, bag limits are much more liberal and they have priority over other users. Placing more restrictions on the CPUDF will only speed this movement.

Prop.64 - oppose

Prohibit a household from possessing permits for multiple personal use salmon fisheries.

The CPUDF and South Central Alaska P.U. dipnet fishery have identical annual bag limits. Each P.U. salmon dipnet fishery represents an individual river drainage and salmon stock. The author of this proposal infers that many P.U. dipnetters are obtaining multiple permits for these two fisheries in order to harvest a full family annual bag limit from each fishery. F&G data from the years 2015-2022 (**see attachment C**) shows that for dual permit holders for these two fisheries, if they fished both permits, had a combined harvest equal to one fishery annual bag limit for the size of their family. There is no justification for passing this proposal.

Prop. 65 – oppose

Require weekly harvest reporting in the CPUDF.

Similar proposals have been submitted in at least 4 of the last BOF PWS/Upper Copper Finfish meetings and were voted down in each. F&G staff comments, have consistently opposed these proposals on the premise that it would place undo burden on P.U. dipnetters and that weekly reporting is not needed and would not be used for management of the CPUDF. The fishery is managed by actual sonar count passage.

Prop. 66 – oppose

Manage the CPUDF to achieve the Gulkana Hatchery broodstock goal.

The CPUDF is a multi mixed salmon stock fishery. Reducing fishing time when supposedly Gulkana salmon are passing through the dipnet fishery will only reduce opportunity for Alaska state residents to harvest Copper River salmon to feed their families and due to the mix of salmon stocks, not guarantee more fish will make it to the hatchery.

Prop. 67- oppose

Prohibit removing king salmon from the water if it is to be released in the CPUDF. This proposal is not practical in many of the back eddies where shore based dipnetters are tied off short to prevent falling into the turbulent water of the Copper River in Woods Canyon. When releasing a king after already harvesting their 1 annual king or because king harvest is prohibited, most dipnetters will try release kings unharmed in the water. Due to precarious dipnetting sites or because the king has become entangled in the net mesh, this is not always possible. Public announcements could remind dipnetters to

release king salmon, not meaning to be retained, be done as gently as possible to ensure they make it to their spawning grounds.

Prop. 68 – **oppose**

Prohibit dipnetting from a boat in the CPUDF.

Productive shore based dipnetting spots within Woods Canyon can be in short supply especially during high water events. For this reason and because some dipnetters are physically not able to dipnet from the rocky outcrops in the canyon, they choose to use a boat. Dipnetting from a boat also gives the mobility to find a better fishing spot. Dipnetting from a boat is just another means for Alaska residents to harvest their set annual bag limit and once filled they are done for the year.

Prop. 69 – **oppose**

Place restrictions on dipnetting from a boat.

Chitina P.U. dipnetters have a set annual family bag limit and once filled they are done for the year. Boat dipnetting just affords users another means of filling their finite family bag limit and should not be burdened with unneeded restrictions.

Prop. 70 – **support**

Extend the lower boundary of the CPUDF

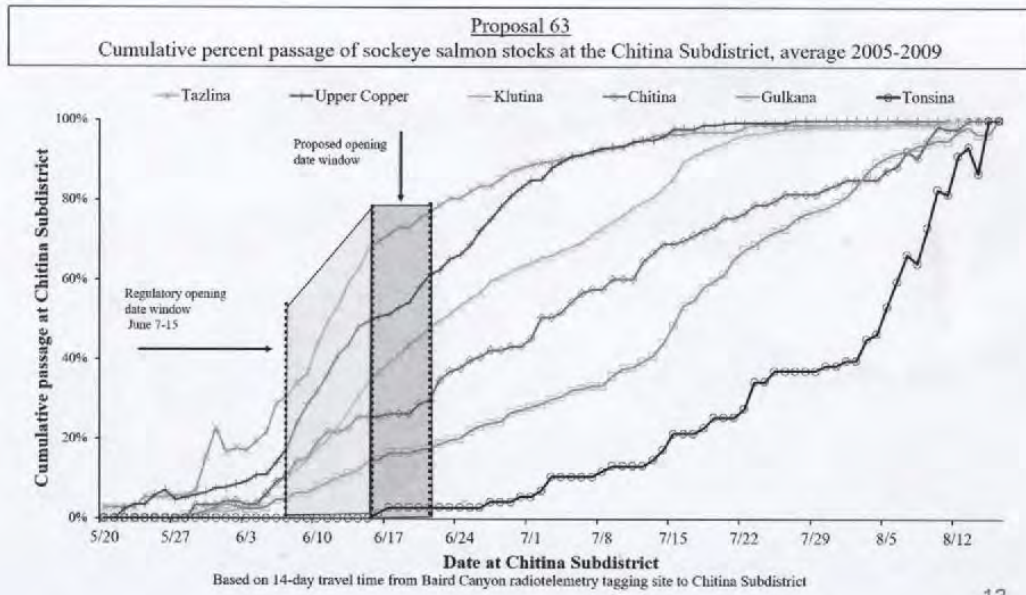
This is a CDA submitted proposal and the proposal language explains our stance. A map showing the existing and new boundary plus the existing short drift area is in **attachment D**.

Prop. 71 – **oppose**

Prohibit guiding in the CPUDF.

At the 2021 PWS/Upper Copper/Upper Susitna Finfish meeting, the BOF eliminated guiding in the Glennallen Subdistrict subsistence fishery. This decision was based on the 8 subsistence criteria and the clause of “pattern of noncommercial taking” was interpreted to relate to guiding within that fishery and therefore a vote to eliminate guides. This is a Personal Use fishery and the only qualifying criteria is the requirement that a P.U. user must be an Alaska resident and possess a valid state sport fishing licence. Many of these resident dipnetters choose to use a guide service to obtain their families salmon harvest and if guiding was eliminated in the CPUDF it would for various reasons (lack of their own equipment, disabilities or new to the fishery) disenfranchise many users.

ATTACH. A



ATTACH. B

Harvest of sockeye and king salmon in the Chitina Subdistrict personal use salmon dip net fishery from June 7-15 each year, compared to total salmon passing through the fishery during that period and percent overall harvest, 2015 - 2023

Year	Fishing hours	Actual harvest		Allowable harvest	
		Sockeye	King	Total salmon count at sonar (May 24-June 1)	Percent of sonar
2015	192	38,279	301	318,761	12%
2016	216	16,324	247	123,139	13%
2017	216	12,749	28	170,998	7%
2018	48	2,624	106	43,364	6%
2019	216	27,856	411	149,088	19%
2020	132	13,416	251	69,794	20%
2021	96	13,981	174	60,299	23%
2022	96	9,328	176	54,278	18%
2023	24	4,597	99	37,690	12%
Average	137	15,462	199	114,157	14%

Note: assumes two-week passage time from sonar to Chitina Subdistrict

ATTACH. C

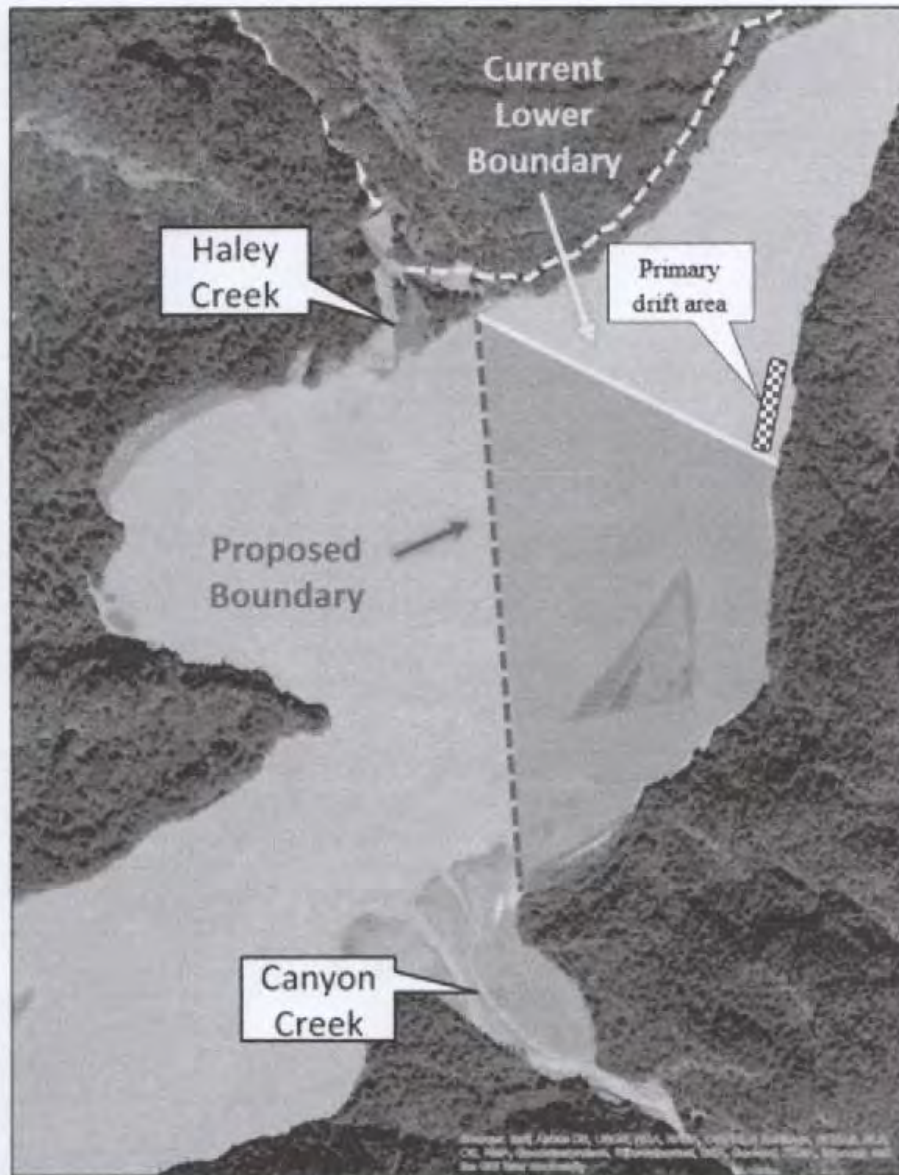
DATA FROM F&G FOR HOUSEHOLDS ACQUIRING BOTH A UCI (SOUTHCENTRAL) AND CHITINA P.U. DIPNET PERMIT

Disclaimer: Since these numbers haven't gone through any biometric review, they don't represent the true harvest estimates we would report on. They are based on the corrected raw data from user reports. So, take it with a grain of salt that the actual numbers may be slightly different than what we see here for usage and harvest.

Permit Year	Household Permits	Households	UCI Fished	UCI Did Not Fish	UCI Did Not Report	UCI Average Household Size	UCI Average Harvest For Households That Fished	Chitina Fished	Chitina Did Not Fish	Chitina Did Not Report	Chitina Average Household Size	Chitina Average Harvest For Households That Fished	AVERAGE FAMILY SIZE FOR DUAL	I FISHERY BAG LIMIT FOR FAMILY SIZE	ACTUAL DUAL HARVEST PER AVE. FAMILY SIZE
2022	UCI Only	26552	19235	3858	3461	3.02	22.15								
2022	Chitina Only	5441						4369	709	368	2.95	27.44	3.475	50	52
2022	UCI and Chitina	1745	1242	360	143	3.42	24.21	1271	359	115	3.53	27.59			
2021	UCI Only	24702	17288	3594	3820	3.04	22.72								
2021	Chitina Only	5536						4397	708	431	2.93	24.96	3.325	49	48
2021	UCI and Chitina	1865	1217	455	198	3.34	24.02	1273	452	140	3.41	24.01			
2020	UCI Only	26331	16104	3643	6584	3.01	19.93								
2020	Chitina Only	4780						3205	1042	533	2.97	16.15	3.42	49	38
2020	UCI and Chitina	2235	1389	470	376	3.43	21.07	1391	601	243	3.40	15.73			
2019	UCI Only	24542	15013	3115	6414	2.97	23.16								
2019	Chitina Only	6188						4317	770	1101	2.98	28.75	3.46	50	50
2019	UCI and Chitina	2051	1199	442	410	3.49	24.82	1275	419	357	3.44	25.46			
2018	UCI Only	22557	13958	3589	5010	3.04	17.83								
2018	Chitina Only	3812						2356	712	744	3.10	22.92	3.63	51	41
2018	UCI and Chitina	1250	727	322	201	3.65	19.62	732	313	205	3.61	21.04			
Total	UCI Only	124684	81598	17797	25289	3.02	21.48								
Total	Chitina Only	25757						18644	3941	3172	3.00	24.40			
Total	UCI and Chitina	9146	5774	2049	1323	3.49	24.01	5942	2144	1060	3.47	22.18			

ATTACH. C

ATTACH. D



Chitina Dipnetters Association

Public Comments (Part B) Concerning Submitted Proposals To The December 2024 PWS/Upper Copper and Upper Susitna Finfish and Shellfish BOF Meeting

Prop. 44 - **Oppose**

Prop. 45 - **Oppose**

Prop. 46 - **Oppose**

Prop. 47 - **Oppose**

Attempts to lump all upriver and downriver subsistence and personal use fisheries together. The upriver Chitina personal use dipnet fishery (CPUDF) is managed by actual sonar counts coupled to preseason estimates and historical average harvest effort for each weekly fishing period. F&G has repeatedly, in past BOF PWS/Copper meetings, said weekly reporting in the CPUDF is not needed and would not be used to manage this fishery and would place undo burden on the users.

Prop. 49 - **Oppose**

Prop. 50 - **Oppose**

Prop. 54 - **Oppose**

Commercial fishing inside barrier island closures during statistical weeks 20 and 21 were put in regulation by the BOF in early 2000's. The reason was to protect early upper Copper king salmon stocks as they mill in these shallow water areas awaiting their run upriver. These kings were highly vulnerable to gill nets in shallow water. With the recent poor Copper king runs and the outcry of upriver ANS, passing this proposal would only prolong this.

Prop. 55 - **Oppose**

In years of poor king numbers with associated strong sockeye run, the Cordova drift gill net fleet may be restricted due to high king mortality in gill nets. Upriver dipnetter guides, during king conservation measures, can release kings unharmed from dipnets and should not be restricted from harvesting sockeyes.

Prop. 56 - **Oppose**

Prop. 57 - **Oppose**

Prop. 48 - **Support**

Prop. 51 - **Support**

This is the best proposal to pass more upriver salmon stocks to meet ANS and spawning escapement.



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

In Reply Refer To:
OSM.24057

NOVEMBER 19 2024

Ms. Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM), working with the other participating agencies, has reviewed the proposals being considered at the December 2024 Prince William Sound and Upper Copper/Upper Susitna Rivers Finfish and Shellfish Meeting. The attached comments from OSM regard proposals that are associated with fisheries resources within Federal subsistence management jurisdiction and are likely to impact federally qualified subsistence users.

Other proposals being considered may affect Federal subsistence fisheries and users. Many of these proposals involve fisheries outside of Federal jurisdiction. Adoption of these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. Furthermore, one or more of the ten Subsistence Regional Advisory Councils may have submitted written comments on these proposals, and we strongly encourage the Board to consider these comments during its deliberations. OSM may also wish to comment during the meeting on other items that impact federally qualified subsistence users.

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

Sincerely,

Crystal (Ciisquq) Leonetti
Acting Director,
Office of Subsistence Management

Chair Carlson-Van Dort

2

Enclosure

Cc: Federal Subsistence Board
Interagency Staff Committee
Office of Subsistence Management
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director of Wildlife Conservation, Alaska Department of Fish and Game
Administrative Record

**RECOMMENDATIONS
ALASKA BOARD OF FISHERIES PROPOSALS**

**Prince William Sound and Upper Copper/Upper Susitna Rivers
Finfish and Shellfish (except shrimp)
December 10–16, 2024
Cordova, Alaska**

Office of Subsistence Management (OSM)

PROPOSAL 47**5 AAC 1.630. Subsisting fishing permits and 5 AAC 77.5XX Personal use fishing permits.**

Proposal 47 would require in-season reporting for subsistence and personal use fisheries.

Current Federal Regulations:**50 CFR §100.25(h) Permits.**

(5) If the return of harvest information necessary for management and conservation purposes is required by a permit and you fail to comply with such reporting requirements, you are ineligible to receive a subsistence permit for that activity during the following regulatory year, unless you demonstrate that failure to report was due to loss in the mail, accident, sickness, or other unavoidable circumstances.

50 CFR §100.27(e)(11) Prince William Sound Area.

(i) You may take fish, other than rainbow/steelhead trout, in the Prince William Sound Area only under authority of a subsistence fishing permit, except that a permit is not required to take eulachon. You may not take rainbow/steelhead trout, except as otherwise provided for in this paragraph (e)(11).

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

Impact to Federal subsistence users/fish: No direct impact expected.

Federal Position/Recommended Action: OSM supports with modification to only adopt the reporting in-season requirements for the personal use fishery portion of Proposal 47.

Rationale: Federally qualified subsistence users in the Copper River drainage have repeatedly raised concerns about levels of salmon harvest from the State personal use fishery. Although management of the personal use fishery is tied primarily to passage counts at the Miles Lake Sonar, more timely reporting of harvest would provide managers with additional in-season information for action if harvests exceed expectations. Many federally qualified subsistence users in the Copper River drainage continue to harvest under State subsistence regulations, and OSM does not support additional reporting burdens on those users.

PROPOSAL 50**5 AAC 1.620. Lawful gear and gear specifications and 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Proposal 50 would prohibit the use of chart plotters or fish finders in the Chitina and Glennallen Subdistricts.

Current Federal Regulations:**50 CFR §100.27(e)(11)(xi)(H) Upper Copper River District subsistence salmon fishing permits.**

(H) While you are fishing from a boat or other watercraft, you may not use any device that indicates bathymetry and/or fish locations, e.g., fish finders. These devices do not have to be removed or uninstalled from a boat or watercraft.

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

Impact to Federal subsistence users/fish: Chart plotters or fish finders are already prohibited while fishing from a boat in the upper Copper River District under Federal subsistence regulations. Adopting this proposal would decrease the efficiency and success for some federally qualified subsistence users fishing under State regulations.

Federal Position/Recommended Action: OSM supports Proposal 50.

Rationale: OSM supports this proposal because it will align Federal and State regulations and reduce user confusion and enforcement concerns. However, chart plotters can be an important safety tool for navigating rivers, especially large and swift rivers such as the upper Copper River. Under Federal subsistence regulations, chart plotters can still be used for navigational purposes. OSM recommends that the Board of Fish clarify they may also be used for navigational purposes under State regulations if this proposal is adopted.

PROPOSAL 72

5 AAC 52.023. Special provisions for seasons, bag, possession, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Proposal 72 would close sport fishing for Chinook and Sockeye salmon in the Gulkana River based on water temperature.

Current Federal Regulations:

No similar regulations

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

Impact to Federal subsistence users/fish: This proposal would help conserve salmon upon which subsistence users rely but may decrease opportunity for federally qualified subsistence users fishing under State regulations. This proposal would not impact federally qualified subsistence users fishing under Federal subsistence regulations.

Federal Position/Recommended Action: OSM supports Proposal 72.

Rationale: Incorporating temperature into fish management is a best practice that is starting to be used in other localities. California asks anglers to avoid fishing in waters that are consistently over 67°F after noon, Colorado issues voluntary closures if water temperatures exceed 71°F and other factors are met, and Vermont and Wyoming discourage catch and release when water temperatures exceed 70°F, while other states, such as Michigan and Maine encourage anglers to consider avoiding cold water species when water temperatures are high (Lubejko and Parker 2022).

Chinook Salmon have been found to respond negatively to extreme water temperatures and low flows, with heat stress leading to pre-spawn mortality (von Biela et al. 2020, Hinch et al. 2021, von Biela et al.

2022, Howard and von Biela 2023). Handling fish in periods of high temperatures only exacerbates this issue and this proposed regulation may offer needed protections. Recent studies show that the Gulkana River supports roughly a quarter of Copper River Chinook Salmon (Schwanke and Piche 2023) and, with the regular occurrence of missed escapements even at the new lower escapement range (ADF&G 2024), OSM finds this approach worthy of implementation.

Citations:

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Howard, K. G., & von Biela, V. 2023. Adult spawners: A critical period for subarctic Chinook salmon in a changing climate. *Global Change Biology*, 29, 1759–1773.

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Schwanke, C.J., and M.J. Piche. 2023. Run timing and spawning distribution of Copper River Chinook Salmon, 2019-2021. Alaska Department of Fish and Game, Fishery Data Series No. 23-14, Anchorage, AK.

von Biela, V. R., Bowen, L., McCormick, S. D., Carey, M. P., Donnelly, D. S., Waters, S., Regish, A. M., Laske, S. M., Brown, R. J., Larson, S., Zuray, S., & Zimmerman, C. E. 2020. Evidence of prevalent heat stress in Yukon River Chinook salmon. *Can. J. Fish. Aquat. Sci.* 77(12), 1878–1892.

von Biela, V. R., Sergeant, C. J., Carey, M. P., Liller, Z., Russell, C., Quinn-Davidson, S., Rand, P. S., Westley, P. A. H., & Zimmerman, C. E. (2022). Premature mortality observations among Alaska’s Pacific salmon during record heat and drought in 2019. *Fisheries*, 47, 157–168.

PC601

November 20, 2024

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

Re: Proposals 15, 16, & 17

Dear Members of the Alaska Board of Fisheries:

The Tatitlek Corporation (TTC) is an Alaska Native Village Corporation in the Chugach Region established pursuant to the Alaska Native Claims Settlement Act of 1971, as amended, 43 U.S.C 1601 (ANCSA). Chugach owns over 108,000 acres of full fee estate and subsurface estate in the areas around community of Tatitlek and in the Prince William Sound. TTC is currently owned by more than 400 shareholders who are primarily of Alutiiq (Sugpiaq). TTC exists to serve the interests of the Alaska Native people of the Tatitlek and to preserve the rich culture heritage of its lands.

For thousands of years subsistence fishing has been vital to our people. Today, shareholders and residents of this region continue to harvest resources from the sea. Sustainable management of the fisheries is critical to the long-term viability of this important resource. The PWS Pollock Pelagic Trawl Fishery bycatch harvests important fish species that are vital to our shareholders, descendants, and residents of this region. Rockfish, black cod, Chinook salmon, and halibut are harvested in this fishery, as allowed in bycatch limits managed by the state. This unintentional take negatively affects local residents that depend on these important resources.

The Chenega IRA Council has submitted three proposals to address the PWS Pollock Pelagic Trawl Fishery. TTC supports Proposal 16 which would close this fishery. This would protect important fish species and habitat from the adverse impacts of the trawl fishery and dragging of pelagic trawl gear on the seabed. If Proposal 16 is not enacted, then we encourage the BOF to support Proposal 15 and 17. Proposal 15 would modify how bycatch limits are set (by pounds, not percent of pollock harvest) and Proposal 17 requires on-board electronic monitoring and observers on a portion of the fishing trips.

Thank you for considering this request.

Sincerely,



Roy Totemoff, CEO

An Alaska Native Village Corporation

PC601

Dear Members of the Alaska Board of Fisheries,

I am writing on behalf of the Tatitlek Corporation to express our grave concerns regarding Proposal 78, which proposes a substantial reduction in pink salmon hatchery production by the Valdez Fisheries Development Association (VFDA). This proposal, if enacted, will severely impact not only our operations but also the broader community of Tatitlek, which relies heavily on the success of local aquaculture.

Immediate Impact on VFDA: The proposed reduction will cut VFDA's annual egg take of pink salmon by approximately 67.5 million eggs. This drastic reduction threatens the return of pink salmon to VFDA and both pink and chum salmon to the Prince William Sound Aquaculture Company, undermining the economic foundation of our community's fishermen and the seafood industry at large.

Subsistence and Community Support: VFDA has consistently collaborated with the Tatitlek Corporation to support the subsistence harvest of coho salmon in Boulder Bay. While we are committed to continuing this vital program, the overarching implications of Proposal 78 may jeopardize our ability to sustain and expand this and other enhancement programs.

Potential for Further Detrimental Reductions: There is substantial concern that the adoption of Proposal 78 will pave the way for further petitions to reduce salmon production, which could cripple our ability to support not only commercial and subsistence fisheries but also essential enhancement programs in the future.

Economic and Cultural Implications: The fisheries and aquaculture programs in question are not just economic engines but also pillars of cultural significance for the Tatitlek community. These potential reductions pose a direct threat to the cultural traditions and livelihoods of our people, who depend on these resources to maintain their way of life.

Call to Action: We urge the Board to consider the extensive and potentially irreversible impacts of Proposal 78 on the communities of Prince William Sound, particularly Tatitlek. It is crucial that this proposal be rejected to preserve the sustainability and vitality of our fisheries and protect the economic and cultural well-being of our community.

The Tatitlek Corporation stands ready to discuss these issues in more detail and to collaborate on sustainable solutions that protect our community's interests. We appreciate your attention to our concerns and look forward to your support in opposing Proposal 78. Thank you for your consideration.

Sincerely,



Roy Totemoff, CEO

An Alaska Native Village Corporation

Submitted by: Chris Thoma

Community of Residence: Valdez

Comment:

Trawl fisheries should use all that is brought up or not fished at all. Wasting a resource and calling it bycatch is just wrong and needs to stop.

CHRISTOPHER THOMAS

BOF 2024 PWS.

I strongly support proposals, 79,80 and 81

All three of these proposals seek to safeguard the success and longevity of the Main Bay hatchery program

PROPOSAL 79. SUPPORT

Specifically, proposal 79 works for all user groups to ensure equitable access to fish, while maintaining the integrity and viability of the Main Bay hatchery.

At this point, without 79 Sport fishing boats inside of the THA, SHA, and AGZ severely impede the cost recovery process. Allowing a single group to block and delay a fundamental necessity of hatchery operation jeopardizes the resource for all user group.

Simply, put, it only makes sense to allow the hatchery get its work done. Common property fishing can take place outside of the terminal harvest area. When cost recovery is completed, all groups will have access inside of the THA...Until its done, nobody gets in. Simple and Equal.

Nobody is losing an opportunity with proposal 79 ... we are ensuring the longevity and success of the hatchery program.

Proposal 80 SUPPORT

Consistency between hatcheries in the sound is important.

More Important is the safety and security of operations and staff. Barrier seine integrity, benefits everyone and protects the resource. We all want access to fish in the future proposal 80 works to do so.

Proposal 81 SUPPORT

Proposal 81 simply seeks to ensure the safety and longevity of the hatchery by protecting those fish intended for broodstock. Proposal 81 would prohibit fishing (snagging) from the shore, inside the barrier seine, essentially on the broodstock fish.

The act of snagging/sportfishing from the broodstock (behind the barrier saying) is selfish, reckless, shortsighted, and should not be permitted in any way shape or form.

Submitted by: Thea THOMAS

Community of Residence: CORDOVA

Comment:

I oppose proposals 51, 52 and 53. ADFG management report for the Copper River states that the sockeye run for 21, 22, 23 & 24 has returned 7-8 days late. The daily and cumulative escapement objectives should also be shifted to 7-8 days later. The sockeye escapement was reached or exceeded. There is no justification for closing the gillnet fishery.

I oppose proposals 56 and 57. In the last 4 years there have been 50 to 100 latent (un-fished) gillnet permits. Adopting this proposals would not reduce the amount of gear, since most likely it is these un-fished permits that would get purchased. In fact, if adopted this proposal would add 50 fathoms more gear for each permit that is "stacked".

I oppose proposals 58 and 59. The solution to over-escapement is not to "liberalize" the upriver fisheries, the solution is to stop over-escaping the river!

I strongly support proposal 79. When it is necessary to take cost recovery at Main Bay, ADFG must have the ability to close all the fisheries.

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

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 been gillnetting in the PWS/Copper River (Area E) since 1981.

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,

Ron Thomson

A solid black rectangular box used to redact the signature of Ron Thomson.

Rochester 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 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: Laurie Thorpe

Community of Residence: Wasilla

Comment:

58: yes	65: no
59: no	66: no
60: no	67: no
61: no	68: no
62: no	69: yes
63: no	70: yes
64: no	
71: yes	

Submitted by: Mike Tinker

Community of Residence: Ester

Comment:

I wrote comments for the Fairbanks AC (as a member of that AC) so I will not repeat those issues here. I'd would like to encourage the Board to use Proposal 51 or one of the other "management plan" proposals to discuss the shortcoming of the existing plan. It has several failure points. First it is outdated by time and technology and should be reviewed and revised. Second, it leads to false outcomes when upriver salmon fishers on the Copper River are "restricted". By that I mean the restrictions do not do the job they are intended to do. That results in the dept thinking the plan is working but not really having a clue. It has restricted subsistence fishers twice in the last few years without the dept even asking them if the measures were effective. No reporting even though the data could/should be added to the DAILY reporting by species. I hope the Board will ask and listen to AC's representing 90% of the fishers on these stocks, those fishing upstream of salt water.



November 26, 2024

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email dfg.bof.comments@alaska.gov

RE: Public comment Proposal 78

Chair Carlson-Van Dort and Board Members:

Trident Seafoods opposes Proposal 78. Trident Seafoods operates two shoreplants in Cordova. These plants serve around two hundred independent commercial salmon fishermen and provide critical tax revenue and commercial activity to the community. Our ability to provide markets for smaller volume fisheries is dependent on the volume provided by hatchery pink salmon production in Prince William Sound (PWS). Without this volume, we would not be able to cover operating costs and remain open during shoulder seasons or justify the high costs of operating in rural Alaska.

We have continued to invest heavily in our Cordova infrastructure, putting millions into value added and full utilization processing, including a state-of-the-art food grade fish oil plant and pet food production line. Our investments are predicated on the commitment by the State of Alaska to manage according to science-based principles and for sustained yield. There are significant risks involved in seafood processing, many of which are out of our control: run fluctuation and environmental variation; market value and global trade policies; and geopolitical conflict, as a few examples. The balance to these risks is a management system that uses science and deliberative decision making to inform policies that ensure the long-term sustainability of and access to the resource.

It is for these reasons that Trident Seafoods strongly opposes Proposal 78. Proposal 78 fails to demonstrate any evidence that a reduction in egg take in PWS will lead to a conservation benefit in or outside of PWS and no evidence to show how such a reduction would not be immediately subsumed by increased production in Russia and Japan. Proposal 78 likewise ignores the science-based approach that ADFG takes in managing hatchery production and operation.

This lack of evidence and benefit is juxtaposed against the very real and definitive harms that will follow should the Board adopt Proposal 78. Reducing egg take in Prince William Sound will directly hurt the independent fishermen, processors, communities, and support businesses that rely on hatchery-directed fishing opportunity during the salmon season. This negative impact will come at a time when many fishing and processing businesses and communities are reeling from two consecutive years of historically poor economic conditions. Further losses will drive some businesses to close and greatly impact community and school programs.

Uncertainty regarding impacts and management will always exist. We depend on the Board to weigh this uncertainty against the known harms and the scale of impact when considering any management action. Here, the balance clearly shows that the harms cause by Proposal 78 are certain and drastic, while the benefits are undemonstrated and the impacts minimal. We therefore urge you to reject Proposal 78.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Shannon Carroll", is written over a horizontal line.

Shannon Carroll
Director, Alaska Public Affairs



November 26, 2024

Alaska Board of Fisheries
Marit Carlson-Van Dort, Chair
Via email dfg.bof.comments@alaska.gov

RE: Opposition to Proposals 14, 15, 16, 17

Chair Carlson-Van Dort and Board Members:

Trident Seafoods opposes Proposals 14, 15, 16, and 17. Trident Seafoods operates a shoreplant in Kodiak that serves independent, Kodiak-based vessels that harvest pollock in Prince William Sound (PWS). While the total volume of pollock harvested in PWS is small relative to the larger Gulf of Alaska fishery, it serves as an important economic opportunity for independent harvesters and the community of Kodiak, while also providing additional hours for the predominately local processing workforce in Kodiak. At a time when the seafood sector is experiencing dramatic losses, these small opportunities can be the difference between staying in business and folding for many.

Trident opposes Proposals 14, 15, 16, and 17 because they are not necessary given the ADFG's existing authority to manage the fishery. Concerns about habitat impacts are not substantiated or relevant given the depth of the areas fished. Also missing from the proposals is a clear demonstration of the conservation benefit to PWS stocks. To the contrary, we are concerned that decreased harvest of the PWS pollock resource will lead to increased predation by pollock on PWS salmon stocks, leading to outcomes contrary to the intent of the proposals. Trident always supports sustainable management measures that are science-based and achieve beneficial outcomes for directed or non-directed fisheries. Proposals 14, 15, 16, and 17 do not do this and instead cause unnecessary harm to local fishermen, businesses, and communities.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read "Shannon Carroll", is written over a horizontal line.

Shannon Carroll
Director, Alaska Public Affairs

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: Tru Tripple

Community of Residence: Fairbanks

Comment:

I'm commenting on several of the proposals. I'm tired of shady politics and special interest groups destroying the great resources of this state. Seafood and fish are for Alaskans first, to subsidize off of to feed our family's. Everyone in Alaska should have access to this resource. The commercial fisheries and by catch are destroying our state's future. Enough is enough

November 24, 2024

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

Dear Board of Fisheries,

I am from Skagway, Alaska, and I believe Proposal 78 could lead to commercial pressure shifting to my area. I support local commercial fishermen through my purchases, and I also sport and subsistence fish. A local hatchery provided the best fishing opportunities we ever had. The hatchery is now gone, and so are the fish.

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 and sustainability that hatcheries provide to Alaskan coastal communities.

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,
John Tronrud



Skagway, Alaska

Submitted by: Daniel Truett

Community of Residence: Palmer

Comment:

I do not support proposal 89. I have been a cabin owner at Lake Louise since 2007. In 2007 you would only see a few ice houses in the winter. Now I can normally count at least 20 or more just from my cabin. Social media has blown the lake up so much. I think it will get over fished again and closed like it was.

Submitted by: Elias Tueller

Community of Residence: Anchorage

Comment:

Vfda was never in a gillnet area. It was never a gillnet fishery. The allocation plan is about the shared fish of pwsac. The copper river flats fish are not included in the allocation plan. Nor is vfda. Thats ok. The allocation plan is all about pwsac. You cant ask to include vfda without including the flats, and coghill. The allocation plan took 3 cycles to complete and nobody was thrilled about it. But its done and fair. Adding vfda revenue without adding additional gillnet revenue is unfair. Also this language that it would not reallocate fish is straight up wrong. If vfdas fish were included in the allocation plan, the result is seiners would loose almost all pwsac production we now have access to.

Submitted by: Lily Tueller

Community of Residence: Anchorage

Comment:

I oppose Proposals 75, 76, and 77. These proposals seem like a creative way to move fish from the seine fleet to the gillnet fleet—like playing musical chairs with fish, but only for the gillnetters. Here’s a fun fact: between 1984 and 2022, gillnetters made \$1.07 billion, while seiners earned \$961 million—a difference of \$110 million. Do you see the seiners complaining and flooding the Board of Fish with proposals? Nope! Sure, some gillnetters grumble about low returns, but guess what? We seiners feel the same pain when our runs flop, like they did spectacularly this year. Sure wish i had a gillnetter in '24. Numbers don’t lie—everyone can cherry-pick years to back their argument, but the allocation plan is working just fine. Since 2006, seiners are up \$64 million, but we’re still behind gillnetters by 110 million since 1984. No big deal. Let’s keep the plan as is and avoid a flood of proposals next cycle.

November 26, 2024

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

Dear Members of the Board of Fisheries,

Our entire family depends on the income earned by fishing for salmon in Prince William Sound, the majority of which is produced at the hatcheries. The money pays for our bills, our home, my older children's college, basically our whole financial picture is paid for by these hatcheries.

The outcome of Proposal 78 would cause more than a 25% reduction in our income. After the last 2 years of low returns and low prices we are already strained financially. A 25% reduction in output would come out of the common property fisheries share of the return, as the hatcheries have a fixed cost that needs to be paid first to pay for their operations. It could easily reduce our (my family's) opportunities to fish by 50% or more. It could be devastating to the fishermen of the region who are already financially stretched, some to the point of bankruptcy

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,

Nathan Tueller

A solid black rectangular box used to redact the signature of Nathan Tueller.

Whittier, Alaska

Submitted by: Wendy Tueller

Community of Residence: Anchorage

Comment:

I oppose prop 78. The 25% reduction is random. There is no evidence to support the idea that hatchery production is adversely affecting king salmon stocks. What is easily observable is the increase in fishery value to fishermen and coastal communities and also an increase in wild stock returns to pws as a direct result of the hatcheries.

Furthermore these eggtake permits are under the direction of adf&g, an agency that has brought salmon in alaska from the brink of failure before stathood, to the healthy, prosperous returns we see today. The link between pws pink and chum hatcherys and king salmon abundance is so thin as to be nonexistent. The kings face serious trouble, and i feel for the people who depend on them, but it seems to me that trawler bycatch, interception, and habitat degradation are much more likley to blame. The ocean is so complex and so understudied that theres no way to connect a 25% reduction at pwsac and vfda with kings returning to the yukon.

Submitted by: Nathan Tueller

Community of Residence: Anchorage

Comment:

Proposal 75. I oppose. What the proposal does not address is that if one looks at all adf&gs numbers since they began recording them(1984), the gillnet group is ahead of the seine group by over 100 million dollars.

The existing allocation plan took 3 board cycles to create, with concessions on both sides. There is no reason to reopen that can of worms. This is just one gillnetter trying to grab a bigger piece of the communal pie.

I oppose Proposal 77. It has been introduced at least 3 different times in almost the exact form by the same person. It has lost 0-6 or 0-7(boards vote) in 2014, 2017, and 2021. Another attempt to grab a bigger slice of the communal pie. It absolutely would reallocate a resource. The net effect would be the end of any August fushing by the seine fleet as nearly all the pwsac enhanced pink salmon would go to cost recovery. Vfda was not included in the allocation plan because it is not part of the communal resource.

November 24, 2024

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

Dear Board of Fisheries,

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. I currently have PWS seine and gillnet permits that I own and operate. I also own a Cook Inlet seine permit and operate a saltwater sport fishing guide business out of Homer, Alaska. My family and I represent four generations of avid sport fishers as well. I have commercial fished Alaska salmon and herring fisheries from PWS to Togiak and Bristol Bay, as well as sport fished in many areas of the state.

I started fishing with my dad when I was 8 years old in the Prince William Sound seine and gillnet fisheries. My sons started commercial fishing with me before they were 8 years old as well. Before the hatcheries were developed in PWS, there were years with no seine fishery. My dad worked with several other fishermen to do the original egg takes and helped design and build net pens and other innovations to facilitate hatchery operations.

To say that we have benefited from hatcheries as a family is a massive understatement. My grandchildren will be the fourth generation of my family to directly benefit from hatchery production economically, and for almost 50 years we have been able to have stable fishing opportunities from both wild and hatchery-produced fish coexisting side by side. While I fully understand there are certain fisheries and species that experience cyclical and environmental fluctuations and difficulties, I would not want to see the state of Alaska return to the age of pre-hatchery years, where fisheries are completely shut down and diminished to a minute fraction of current levels. This is not the answer to the current issues. I believe we need an "all means included" solution to fisheries management with wild and enhanced fisheries coupled with responsible conservation of stocks and reductions of bycatch of species that are in critical decline (halibut, salmon, and crab). This is the only path over the long term that we will see all user groups benefit.

Prince William Sound stands out as an example of how wild and hatchery-produced fish can exist and benefit all user groups over a long period of time. We have experienced almost 50 years of substantial viability of both the resource and the economic benefits to individual users and communities. There are many other factors that have, in recent years, negatively affected our fisheries, such as inflation in our cost of food, fuel, insurance, taxes, cost of maintenance and repair, banking and market crises, high interest rates, etc.

If there is a reduction in current production levels of enhanced fish, it will be yet another nail in the coffin of viability for an industry that has provided a good living and lifestyle for my family for many generations.

Sincerely,
Steve Tutt

[REDACTED]
Homer, 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

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 with my dad in PWS salmon seine and gillnet fisheries in 1970. I currently hold salmon seine and drift permits in PWS and a Cook Inlet seine permit. My family, including 3 sons and son-in-law currently represent 5 Alaska born and raised, resident households, we are all commercial and avid sport fishermen who own and operate our own vessels, whose sole income is derived from salmon seining in PWS. We have all participated in fisheries from SE, PWS, Kodiak, Kamishak, and Togiak herring to salmon fisheries in SE, PWS, Kodiak, and Bristol Bay.

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,

Steve Tutt

A solid black rectangular box used to redact the signature of Steve Tutt.

Homer, Ak

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 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.

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**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:

November 24, 2024

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

Dear Board of Fisheries,

I am from Homer Alaska, I currently have PWS seine and gillnet permits that I own and operate. I also own a Cook Inlet seine permit and operate a saltwater sport fishing guide business out of Homer, Alaska. My family and I represent four generations of avid sport fishers. I have commercial fished Alaska salmon and herring fisheries from PWS to Togiak and Bristol Bay, as well as sport fished in many areas of the state. I started fishing with my dad when I was 8 years old in the Prince William Sound seine and gillnet fisheries. My sons started commercial fishing with me before they were 8 years old. Before the hatcheries were developed in PWS, there were years with no seine fishery. My dad worked with several other fishermen to do the original egg takes and helped design and build net pens and other innovations to facilitate hatchery operations.

To say that we have benefited from hatcheries as a family is a massive understatement. My grandchildren will be the fourth generation of my family to directly benefit from hatchery production economically, and for almost 50 years we have been able to have stable fishing opportunities from both wild and hatchery-produced fish coexisting side by side. While I fully understand there are certain fisheries and species that experience cyclical and environmental fluctuations and difficulties, I would not want to see the state of Alaska return to the age of pre-hatchery years, where fisheries are completely shut down and diminished to a minute fraction of current levels. This is not the answer to the current issues. I believe we need an "all means included" solution to fisheries management with wild and enhanced fisheries coupled with responsible conservation of stocks and reductions of bycatch of species that are in critical decline (halibut, salmon, and crab). This is the only path over the long term that we will see all user groups benefit.

Prince William Sound stands out as an example of how wild and hatchery-produced fish can exist and benefit all user groups over a long period of time. We have experienced almost 50 years of substantial viability of both the resource and the economic benefits to individual users and communities. There are many other factors that have, in recent years, negatively affected our fisheries, such as inflation in our cost of food, fuel, insurance, taxes, cost of maintenance and repair, banking and market crises, high interest rates, etc. If there is a reduction in current production levels of enhanced fish, it will be yet another nail in the coffin of viability for an industry that has provided a good living and lifestyle for my family for many generations.

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,
Steve Tutt

[REDACTED]

Homer, Alaska

Submitted by: Chris Tyson

Community of Residence: PNW

Comment:

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the irreversibly 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 significant measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.



UNITED FISHERMEN OF ALASKA

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E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

November 26th, 2024

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

RE: Opposition to Proposals 5/14/15/16/17/51/78

Dear Chairwoman Carlson-Van Dort,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 36 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast. UFA has taken positions on the following proposals for the December 10th through December 16th Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (Except Shrimp) Meeting.

Proposal 5 – Oppose

UFA opposes proposal 5. This proposal seeks to limit commercial longline fishing and disrupts the established balance between management agencies by closing down areas that are used by halibut longliners, who are managed by the International Pacific Halibut Commission (IPHC), and establishes a precedent of State authority to do so. UFA supports the sustainable management of our resources by the authorized management bodies and believes that the state's authority to supersede the IPHC in state waters is unclear. Commercial longline fishermen are held to a Guidelines Harvest level limit for rockfish harvest, and every rockfish is retained and counted toward that limit. On the other hand, recreational harvest is not limited or fully tracked. UFA believes this proposal places the burden of conservation solely on commercial fishermen, rather than equitably sharing that burden between commercial and recreational sectors.

If proposal 5 were to be adopted, it would disproportionately impact small vessels that are primarily built for gillnetting on the Copper River flats and are used to longline halibut as a way to diversify their businesses. These small vessels often cannot safely venture into the Gulf of Alaska for their halibut longline trips as the weather can be too severe to safely operate these vessels in the fishery. By adopting this proposal, these fishermen would have to face the prospect of either not being able to fish, or put themselves, their crew and their vessels in harm's way to harvest their quota.

Proposals 14-16 – Oppose

UFA opposes proposals 14-16. UFA is opposed to Board of Fish proposals that look to largely eliminate or restrict a fishery to the point that the fishery is no longer viable for the user group. The PWS Walleye Pollock fishery has been a historically important fishery to the local Gulf of Alaska trawl sector as pollock tend to aggregate in PWS before areas further to the west in the Kodiak region. The PWS fishery allows for vessels to operate earlier in the season, provides income for crew, brings product to the processors and supports wages for processor workers, and generates fish tax for the communities.

The PWS Walleye Pollock trawl fishery is very tightly managed by ADF&G in close collaboration with the industry. ADF&G requires vessels to notify the Department when they leave Kodiak, and to check in and out as they enter and leave PWS, respectively. Further, vessels are required to report catch tow by tow, and no more than a handful of vessels are allowed to participate in the PWS pollock fishery at one time. Establishing a static bycatch weight limit in regulation restricts the manager's ability to manage the fishery based on current conditions and would eliminate ADF&G's ability to adjust and manage bycatch through emergency order. Emergency order is a vital tool to ADF&G's ability to manage all State fisheries and UFA does not support proposals that restrict tools that ADF&G is currently using to sustainably manage State fisheries.

Proposal 17 – Oppose

UFA opposes proposal 17. Neither ADF&G nor the Board of Fish has the authority to require the implementation or use of Electronic Monitoring (EM). While UFA does support the use of EM when designed cooperatively with stakeholders, state statutes do not currently allow for the use of EM. In the case of the PWS walleye pollock trawl fishery, like all other state fisheries, ADF&G already has the authority to deploy physical observers onto the vessels when they see fit but has already deemed that step unnecessary. This shows that requiring new monitoring techniques would be a jump beyond what is necessary in an already highly managed and scrutinized fishery.

Proposal 51 – Oppose

UFA opposes proposal 51. UFA sees proposal 51 as an attempt by an outside agency to dictate how the State can manage a fishery in a way that would put a disproportionate amount of conservation burden on the fishery participants. Proposal 51 would supersede ADF&G's ability to manage the Copper River drift gillnet fishery through emergency order, the management tool used for all state salmon fisheries, and would instead put restrictions on the commercial sector while still allowing all other user groups the opportunity to harvest the shared resource. This puts constraints on ADF&G's ability to properly manage the fishery and pushes the shared burden of conservation from all user groups onto the commercial sector.

Proposal 78 – Oppose

UFA opposes proposal 78. UFA has a longstanding position of support for hatcheries and the economic benefit and stability that they provide to the fishermen and communities of Alaska while also reducing harvest pressure on the wild stocks. Hatchery programs have existed in PWS since 1975 and have provided a sustainable, supplementary harvest to the likewise

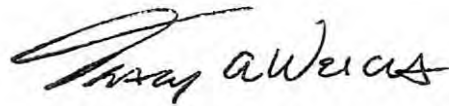
sustainable wild stocks in the region. This proposal would disrupt nearly 50 years of management and collaboration between ADF&G and the private non-profit hatchery operators and disregard the permitting that requires the hatcheries to minimize adverse effects on wild stocks.

As there is currently no definitive evidence as to the effects on interactions between hatchery and wild salmon in PWS or outside in other State waters, UFA is opposed to limiting hatchery egg takes based solely on assumptions without scientific basis. UFA looks forward to reviewing, once they are published, the findings of ongoing research by ADF&G to determine whether interactions occur between hatchery and wild stocks.

Regards,



Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Trollers Association
Alaska Whitefish Trawlers Association • Area M Seiners Association • At-sea Processors Association
Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve • Cape Barnabas, Inc. • Concerned Area "M" Fishermen
Cook Inlet Aquaculture Association • Cordova District Fishermen United • Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel
Owners Assn Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Crab Alliance Cooperative • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association • Northwest
Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast
Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters
Valdez Fisheries Development Association

P.O. Box 125 Valdez, AK. 99686 1815 Mineral Creek Loop Road Valdez, AK 99686
(907) 835-4874 Fax (907) 835-4831 Mike.Wells@valdezfisheries.com



November 22, 2024

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: Proposal 78 – 5AAC24.370 Prince William Sound Management and Salmon Enhancement Allocation Plan

Chairman Carlson-Van Dort, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit comments on proposals submitted to the Alaska Board of Fisheries (BOF) at the Prince William Sound/Upper Copper/Upper Susitna Rivers Finfish & Shellfish meeting. The Valdez Fisheries Development Assoc., Inc. (VFDA) provides the following comments **in strong opposition to Proposal 78**.

The VFDA was established in 1980 and operates the Solomon Gulch Hatchery (SGH) in Port Valdez. A 501(c)3 not for profit corporation, we exist to enhance commercial, sport, and subsistence fisheries in Prince William Sound (PWS). VFDA is permitted to incubate up to 270 million Pink Salmon eggs and 2 million Coho Salmon eggs annually.

The production of VFDA pink salmon contributes significantly to the economies of Southcentral Alaska. For the period of 2012-2017, PWS seiners harvested a total of 354M pounds of VFDA pinks, worth an estimated \$114M in ex vessel value.¹ Although recent years have seen less abundance, for the period 2020-2023, VFDA contributed 38%, 35%, 74%, and 37% of the respective annual pink salmon commercial harvest². In 2024, VFDA contributed 61% of the commercial pink harvest.³

VFDA coho salmon production has created one of the largest sport fisheries in Southcentral Alaska. Releases of juvenile SGH coho salmon provide for an annual average sportfish harvest of 21,342 salmon for the period 2014-2023⁴. VFDA's coho returns generated approximate \$9M in sportfish economic impact for that time period, mostly within the community of Valdez⁵. In addition, 20,000 SGH coho are released each year at no charge through a cooperative effort with the Native Village of Tatitlek to provide for an annual subsistence harvest for its residents.

The economic, social, and cultural benefits of VFDA's enhancement programs are vast and far reaching. For these reasons, VFDA takes any attempt to reduce its permitted egg take capacity very seriously and will vigorously defend our ability to maintain our programs to provide continued benefits to Alaska's commercial, sport, and subsistence fisheries. To address this most recent threat, we submit the following comments opposing Proposal 78.

Proposal 78- 5AAC24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan.

First, I will speak to the proposal itself, and then the effects it will have on VFDA and its beneficiaries. Proposal 78, a slightly revised version of its previous forms, was heard last year as Proposal 43 at Upper/Lower Cook Inlet where it failed on a 1:6 vote. Proposal 59, also submitted by the Fairbanks AC, was rightfully pulled from the Kodiak meeting for a lack of regulatory conformity. These proposals, along with others submitted by various authors over the years, have consistently been rejected because no evidence exists to show an empirical causal linkage between Alaska hatchery produced pink salmon and the decline of Western Alaska, or other, wild salmon stocks. In fact, the author recognizes this and makes the strongest case for rejecting Proposal 78 and others when stating within the proposal narrative itself:

¹ Economic Impacts of the Valdez Fisheries Development Association (McDowell 2018)

² 2020, 2021, 2022, 2023 ADF&G PWS Salmon Season Summary

³ 2024 ADF&G PWS Salmon Season Summary

⁴ ADF&G Sport Fish Data

⁵ Economic Impacts of the Valdez Fisheries Development Association (McDowell 2018)

"All those proposals have been refused on the basis of lack of conclusive evidence that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying."

We are aware of no new conclusive evidence, introduced in the last year to change the above statement. However, Alaska's salmon hatchery operators have provided for the record over the years, strong scientific study refuting these assertions that hatchery salmon cause a deleterious effect to the marine ecosystem. We have demonstrated the true scale of Alaska hatchery produced pink salmon biomass within the North Pacific (UCI RC070) and referenced papers showing the empirical effects of climate change, both within the fresh and saltwater life periods for stocks in question. Hatchery operators have referenced numerous papers to show minimal effects of hatchery salmon on the sustainability of other species due to competition for food.

In addition, the Alaska Dept. of Fish and Game's (ADF&G) Salmon Ocean Ecology Program, in researching Eastern Bering Sea salmon stocks is finding a myriad of non-hatchery related conditions that are effecting their recovery.

There are several fundamental flaws that disqualify Proposal 78 from being reasonably considered. These are:

- 1.) Proposal 78 cites 5AAC24.370 as the regulation to impose a hatchery permit egg take reduction. Hatchery permits however are not held in regulation, but are established within the administrative code. Over the years, similar efforts to reduce hatchery production in PWS have tried and failed using 5AAC24.370, 5AAC40.820, 5AAC24.363-370, and even a nonexistent 5AAC40.1XX to tie this action to some regulatory structure.
- 2.) 5AAC24.370 establishes an allocation plan. It is an adjudicated structure for allocating the value of returning Prince William Sound Aquaculture Corp. (PWSAC), hatchery pink and chum salmon between the gear groups that harvest those salmon. It is not a proper place to opine the complex effects of hatchery/wild interactions, nor propose an arbitrary amount of allowable egg take levels for PWS hatcheries.
- 3.) VFDA is not now, nor has it ever been, a part of the PWS Management and Salmon Enhancement Allocation Plan. Using 5AAC24.370 to address VFDA's permitted pink salmon production is not relatable and completely irrelevant to its intended purpose of allocating PWSAC salmon.
- 4.) Proposing a reduction of 25% to both VFDA and PWSAC is completely arbitrary. If you recall, when this was submitted last year by the Fairbanks AC, it was proposed as to 25% of year 2000 production, or a full 75% reduction for Lower Cook Inlet hatcheries. This was later confirmed by RC021 for UCI to mean just that. These suggestions actually have meaning and carry with them significant economic and social weight if adopted. The author has shown no reasoning for justifying a 25% reduction to both pink and chum egg numbers in PWS, nor provides any documented consideration of the negative impacts of the request to the stakeholders.
- 5.) The proposer desires to, "Then do an evaluation within five years". We would strongly question the intent of this statement. One would reasonably expect deliverables be clearly defined before such a capricious action be taken. What is an acceptable outcome and to who? What agency or entity will be responsible to determine whether this action even produced a beneficial effect? This proposal is vague, undefined, and its intended outcome is uncertain as it relates to the conservation concerns expressed. One thing is certain however, the economic damage inflicted upon viable hatchery programs and an industry already in crisis will be staggering.

In closing, I cannot state more emphatically how disruptive imposing a 25% reduction of pink salmon production will be to VFDA, other Alaska hatcheries, and the communities and fishermen they support. However, I will provide some examples to clarify our concerns for your consideration. These are:

Loss of permitted egg take capacity

- VFDA's permitted pink salmon egg take capacity will be reduced by 67.5 million eggs, leaving a remaining egg take capacity of 202.5 million eggs. VFDA has not operated at this production level since 1992.
- Total PWS egg takes of pink and chum salmon to be reduced by 199 million eggs and 41 million eggs, respectively.

Loss of returning hatchery salmon

- Estimating annual returns are largely dependent on ocean conditions. However, based on an historic average marine survival of 6.27% for SGH, the seine fishery can expect to experience an immediate potential loss of 4

million adult pink salmon available for harvest beginning in 2027. Based on an average grounds price of \$0.41⁶ per pound, that will result in an estimated loss of \$5.5M in annual ex vessel value from VFDA alone.

- Total PWS losses in ex vessel value by reducing production of all PWS hatcheries by 25% is estimated to be \$10.8M in pink salmon and \$3.6M in chum, based on a ten year average of years 2012-2024⁷.
- Losses in first wholesale value to seafood processors, raw fish taxes collected, and lost enhancement tax to hatchery operators will be exponentially compounded.

Loss of stability to the seafood industry

- At this time, the industry is in crisis due to increased production costs and global market disruptions. If production of the most abundant salmon species is reduced, this action will set a precedence that will send shockwaves through the entire seafood industry.
- Loss of harvest opportunity as the reduction of hatchery fish increases impacts on PWS wild fish stocks.

Loss of stability for VFDA

- The instability created by this action may affect our ability to borrow funds from the enhancement revolving loan fund and retire our debt. Production will be uncertain from year to year, rendering an inability to plan for long and short term financial stability.
- If adopted, VFDA will be forced to amend the SGH Annual Management Plan and submit a significantly revised plan to the Regional Planning Team before April 1, 2025.
- VFDA will be forced to adjust its operating model to fit a much lower level of production. Lower returns to SGH may reduce our ability to generate corporate escapement more reliably, especially in years of low ocean survival, and/or reduce our ability to provide for a significant public benefit.
- Adjustments to our operating model will result in staff reductions and strand capital infrastructure investments we made to produce pink salmon at current permitted levels previously approved by ADF&G.
- VFDA will be forced to suspend plans to build a new coho salmon rearing facility due to the uncertainty of future actions by the BOF. This will result in the loss of a long standing goal of VFDA to create a viable Chinook salmon sport fishery for the Valdez community, which the new facility would accommodate.
- Our coho sportfish program receives approximately 65% of its annual operating budget from the sale of pink salmon cost recovery. All existing and future hatchery infrastructure needs require funding by pink salmon cost recovery revenue. Additional requests to reduce hatchery pink salmon, which will certainly be forthcoming if this proposal is adopted, could eventually jeopardize our ability to fund our coho program.

This proposal is ill advised and reckless. It will harm Alaska's hatchery programs in an attempt to conduct an experiment to try to increase Western Alaska salmon abundance.

Since the inception of private non-profit salmon hatchery programs, the state has relied on the application of robust scientific research to guide hatchery operations and permitting. The BOF has focused its regulatory responsibility on the allocation of enhanced resources and has never weighed into areas of hatchery permitting or production; the department has competently and sustainably administrated these functions. This separation of jurisdiction has served Alaska well and we urge the BOF to observe historic practice when considering requests from individuals for direct board intervention to limit or reduce hatchery production.

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on this proposal. **We would respectfully request that the board reject Proposals 78, and also reject Proposal 156 scheduled for the Southeast and Yakutat Finfish Meeting in 2025.** Thank you for your consideration.

Sincerely,



Mike H. Wells
Executive Director

⁶ Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1)

⁷ Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1&2)

The Alaska Board of Fisheries should support Proposal 78 and a 25% reduction in hatchery releases of pink and chum salmon.

Neither the hatchery operators nor the Department has provided credible data showing the relationship(s) between hatchery releases and returns of wild and hatchery adults. Why should the Board assume that the more hatchery fish released the better? Why should the Board assume that hatchery releases are supplementing not supplanting wild salmon?

The State of Alaska has a 'sustained yield principle' for natural/wild resources mandated in Article VIII of its Constitution. In 2000, the State of Alaska adopted the Sustainable Salmon Fisheries Policy regulation (5 AAC 39.222) for wild salmon stocks and their habitats that incorporates a 'precautionary approach' to manage salmon stocks, fisheries, artificial propagation and essential habitats conservatively in the face of uncertainty. Alaska also has other regulations (i.e., 5 AAC 39.220, 39.223, and 41.030) mandating a priority to wild stocks and their habitats. In 2005, Canada adopted 'Canada's Policy for the Conservation of Wild Pacific Salmon', which also incorporates a precautionary approach. The precautionary approach, or precautionary principle, has been used and adopted worldwide in efforts to protect the environment and biological diversity since the 1990s. The precautionary approach needs to be applied to the permitting of salmon hatcheries.

Should we unnaturally mate, rear, release, and harvest hatchery salmon? Is there a huge open niche in the ocean to rear hatchery immigrants without harm to wild biota in the ecosystem? Can we sustainably enhance salmon returns by just "fixing" naturally poor egg-to-fry survivals and releasing millions of super-sized, non-locally adapted, juvenile salmon into the wild? There doesn't need to be an accompanying increase in marine-derived fertilization of the watersheds to help nurture releases into viable spawners? Should we assume that the carrying capacity for biota is unlimited, not already filled with locally adapted biota, and not sustained by the recycling of their nutrient elements?

Ecologically, it is reasonable to assume that hatchery releases supplant wild salmon rather than supplement them. Ecologically, it is reasonable to assume the put-grow-and-take basis of production hatcheries results in unsustainable nutrient mining, ecological overshoot, an inability to sustain or rebuild wild salmon populations, and even an inability to sustain hatchery returns. We must question the ecological niche for hatchery fish since they are so ecologically different from wild salmon and since sustaining wild salmon populations and the fisheries depending on them is our highest priority. How can hatchery fish help wild fish?

As a fish biologist and quasi-ecologist, I caution that there is not a big open niche in the ocean for rearing millions of hatchery immigrants. Hatchery immigrants compete for space and food with wild salmon, spawn with and reduce the fitness and biodiversity of wild salmon, and their growth and commercial harvest consumes more biogeochemical resources than they recycle. This contributes directly to ecological overshoot and to the declining or depressed populations of wild salmon, Pacific herring, and eulachon now observed wherever there are production releases of hatchery salmon.

Poor survivals of wild salmon results in low harvests, low escapements, low marine-derived nutrients, low system productivity, low brood-year returns, and years, or decades, of fishery restrictions to rebuild escapements and returns. This hatchery-induced production collapse is both expected and avoidable. We should expect it will take years or decades to erode the carrying capacity with hatchery releases, and years or decades to rebuild the carrying capacity with wild spawners. The rebuilding of wild salmon populations is impossible with continued production releases of hatchery salmon. Salmon hatcheries have no place in sustainable salmon management. A 25% decrease in releases is justified.

Ben Van Alen

Submitted by: Mark Van Ardsale

Community of Residence: Eagle River, AK

Comment:

I am writing to support Proposal 16.

I am a longtime resident and summer sport fishermen in PWS.

I am in favor closing the Prince William Sound pelagic trawl fishery.

I do not, and nor should the state of Alaska, place the commercial catch of low value pollack over the sport, subsistence, and commercial catches of high value salmon. In the face of declining salmon populations all over the state, we can no longer allow for the wanton waste created by the pollack trawl fleet.

Submitted by: Benjamin Van Dyck

Community of Residence: Cordova

Comment:

I strongly oppose amendments 51,52,53.

November 26, 2024

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

Dear Members of the Board of Fisheries,

I've been a commercial drift fisherman in Cook Inlet for 59 years. I have seen good years and bad years. I have been on the Cook Inlet RPT since it was formed over 40 some years ago. What I've seen is that commercial fishermen are the easiest target for all the woes of the salmon fishery. The proposer lists five main reasons for the decline of salmon but targets only one: hatcheries.

American fishermen suffer while Russia and Japan can put as much salmon as they want into the ocean. Just like the carbon business. *Let the Americans suffer while we don't.* It is not the Board of Fisheries job to regulate hatcheries. They have enough to do. In the early 80's in Sitka the BOF was going to regulate the amount of cost recovery a PNP could have. That went down like proposal 78 should. I was there on the RPT.

I have been on the Board of the Cook Inlet Aquaculture Association for 44 years. We were tasked by the legislature to increase salmon production Statewide. Hatcheries were a part of the increase and have been successful. Even the state with its FRED division saw the value in hatcheries. The BOF shouldn't be involved in the hatchery business. There is a procedure for hatchery regulations that is successful. If the BOF takes this action they will be involved with all the PNP hatcheries. What a nightmare for the BOF.

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,

Stephen Vanek



Ninilchik, Alaska

Submitted by: Joshua Velez

Community of Residence: Anchorage

Comment:

Dipnet charters should be allowed to remain in use. All of this government control is ridiculous. Let the people operate and run these businesses that benefit ALASKANS. Taking these rights away would take the livelihoods of good people who provide food and a good experience to residents of the state. Putting these restrictions in place will hurt the people of the state.

Submitted by: Edward Vey

Community of Residence: Palmer

Comment:

Proposal 51, if adopted, requires more fish in the river. Although it may allow dipnetters and sport fishing interests greater opportunity, it also provides greater escapement to the benefit of the river itself and us all. This is the big take we all must support to ensure the salmon entering this river and sustaining many other tributaries remain that way for years to come. Given the fate of the Y-K runs, so many more people are feeding their families from the bounty of the Copper. Let's not repeat the results of past river fishery management practices and start thinking long-term by taking the proactive step now to mandate greater in-river fish numbers for the Copper River to the benefit of us all. Let this action stand for our unified commitment to a healthy and productive river for the future generations of fishermen and to all communities that depend upon it.

Submitted by: George Vrablik

Community of Residence: Anchorage

Comment:

I am opposed to proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66,67,68,69,71, and 72. The Copper River is a dangerous fishery made incredibly safer by the skilled guides who operate dip netting charters in the summer. My family has been harvesting from this fishery for over 40 years and it is an important source of our year round protein. Please, don't take any action that restricts this valuable resource to resident Alaskans or endangers more lives by eliminating or restricting the hard work the river guides provide. Respectfully,

George Vrablik

Anchorage

Submitted by: John W

Community of Residence: Fairbanks

Comment:

Prop 89 - I oppose increasing the bag limit for burbot. Lake Louise is road accessible and susceptible to over harvest of burbot especially with guides having multiple clients out a day.

Prop 90 - I support with amendments modifying the regulations in Crosswind Lake to no more than two lines for burbot fishing instead of five lines with bait. I think the bag/possession limit can still be five burbot. I have seen an increase in harvest (intentional and unintentional due to mortality) of burbot and lake trout with cabin dwellers and others putting out multiple "burbot lines," some overnight, that catch both burbot and lake trout and it seems to increase lake trout mortality. Reducing the number of lines that can be out may help reduce over harvest and lake trout mortality.

Prop 92 - I support extending the use of bait for taking Late Trout and Burbot in Paxson and Summit Lakes. Sport fishing effort and harvest seems relatively low, and the change would increase opportunity.

Submitted by: Jon Wagner

Community of Residence: Wasilla - Mat Su Borough

Comment:

The vast majority of these newly proposed regulations favor large corporations and the Pacific Fisheries Council rather than focusing on the small communities and small businesses who rely on season fish runs.

Submitted by: Lee Wagner

Community of Residence: Ketchikan

Comment:

Proposal #14

I'm in support of this proposal.

Trawling has nothing but negative effects on the entirety of the ocean and all of its inhabitants and those who survive off of the ocean.

The East coast is a prime example of the detrimental impact that has yet repaired itself and it won't ever be the same; devoid of the life it once held. And now the west coast is following suit.

Trawling needs to stop and be banned forever.

Submitted by: Tazia Wagner

Community of Residence: Metlakatla

Comment:

I am commenting on and in support of the Commercial Groundfish proposal 14. I believe that the pelagic walleye pollock trawl fishery needs to be closed until it can be absolutely guaranteed it won't disturb and destroy the seabed ecosystem.

The trawl industry is full of wanton waste and the amount of reported allowable bycatch is sickening. There are communities dependent on customary and traditional use of salmon and have been unable to harvest for several years. We are talking a whole generation not knowing how to harvest from their rivers, smokehouses sitting cold and dormant, and cultural and physical wellbeing at risk.

Halibut, shellfish, and salmon numbers have declined and it is scary to see how far money and greed talks. I want my descendants to be able to grow up with the same way of life I was privileged to be brought up in. Closing the pelagic walleye pollock trawl fishery is a good step in the right direction for our future.

Submitted by: Cindy Wagner

Community of Residence: Metlakatla

Comment:

On #14 I fully support the AOC proposal.

Submitted by: Shirley Waltz

Community of Residence: Washington state

Comment:

My first choice would be Prop 16 which would close the pollock trawling season. I don't like trawling as it can catch salmon, halibut and other fish. Also we need to be careful not to overfishing. Other countries are also catching these fish and we need to be careful. If this isn't done then I would like proposition 17 implemented with electronic but I would like the boats be required to have an observer on board for the entire time. I had a niece who was a NOAH observer and they attempted to get them to let them cheat on the rules. Luckily she was strong and refused to be intimidated.

Board of Fish,

I am writing to 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

My family and I have fished at Chitna on multiple occasions. Each time has been by way of a charter service.

Although I have been fishing for much of my life, there are many areas and types of fishing that I am not comfortable with unless I use a guide service.

Fishing along the banks of the Chena River or Clearwater is nothing in comparison to Prince William Sound, Kachemak Bay or the Chitina and Copper Rivers.

By allowing charters in these areas, individuals can SAFELY participate in fishing, whether it be subsistence or sport fishing.

I realize these proposals target Dipnet Fisheries in the Personal Use and Subsistence fisheries statewide, however I mention the bay and the sound as examples of the diversity in our Alaskan waters.

As an issue of public safety, having experienced captains in these locations greatly reduces the likelihood of fatalities in an already notorious fishing location.

I would much rather see a charter with 6-people aboard than more boats in the river with inexperienced boat operators. Or additional fishermen situated along the cliff faces dangling by ropes and makeshift harnesses.

This helps alleviate crowding and potential environmental issues (fuel spills, overturned boats, etc.)

I have relatives that are older now (in their 70's). Charter services give them the opportunity to continue to fish safely and without the expense of maintaining and operating a boat each season.

The manner in which these charter services operate do NOT provide dip-netters with an unfair advantage over other personally owned watercraft.

Opposition would be more understandable if the equipment used allowed them to get into otherwise unreachable areas, but this is not the case.

I oppose propositions that require charter services to be responsible for reporting catch numbers. This is already required for fishing license holders, the redundancy provides little benefit.

This may also become confusing to new fishing license holders, they may believe the charter is responsible for reporting, or counts may differ by one or two fish for a household.

The proposal seems onerous and may be trying to solve a problem that doesn't cause much angst.

However, I do support a proposal for quicker reporting to the state from people fishing. I believe this additional requirement would be beneficial for gathering data.

Again, my opposition centers around public safety, the environment and inclusion of the older generations. I believe the resource is currently well managed. The work our Fish and Game does is commendable.

Please keep our Personal Use areas safely available to the widest number of Alaskans.

Thank you for your time.

Matt Want

Fairbanks, Alaska

[REDACTED]

Submitted by: Matthew Want

Community of Residence: Fairbanks

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

Submitted by: Jared Wardle

Community of Residence: North Pole

Comment:

I am opposed to proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71. We should be limiting commercial fisheries not personal use and residents of Alaska! STOP giving being driven by greed!

Alaskan 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 Curt Waters. I am a 40 year veteran of Kodiak fisheries and the captain, and one of the owners, of the FV/ Alaska Beauty out of Kodiak, AK. I have fished on many different boats in Kodiak since 1983. Three of those boats have fished in the PWS pollock fishery in years past.

Four years ago, my wife, Avenue, and I, along with Tami Starr and her husband Richard Starr, also a 40 year veteran of the Kodiak fisheries, bought the FV/ Alaska Beauty, a boat that has participated in most of the Kodiak fisheries, including the PWS pollock fisheries. This is a Kodiak family owned business that employs long time Kodiak residents. We also tender salmon and herring with the Alaska Beauty. Our vessel provides four part time jobs and 4 full time jobs, year round.

I have participated on three different boats in past years in the PWS pollock fishery and continued participation in the PWS pollock fishery is part of our business plan. The Alaska Beauty is an EM boat. We have not participated in the PWS pollock fishery in the last three years due to equipment breakdowns. We plan to fully participate in 2025.

The fishery is well run by the state in all ways. There are check in and check outs, daily reporting and vessel limits on a trip by trip basis.

In my 40 year career as a Kodiak fisherman, we have lost half of our fishing time as well as half of our fishing grounds. This loss is due to many different regulations. With fuel prices as high as they are (currently \$4.40/gal) and fish prices as depressed as they are (9.5¢ this past fall), we cannot afford to lose another fishery. And it is not just the two families that own the Alaska Beauty experiencing this. The coastal communities adjacent to these resources, and the processors for these resources, cannot afford to lose the PWS pollock fishery.

We especially cannot lose any more fishing opportunities. There is nowhere else we can go to make up for lost income, as our boat is too small for the Bering Sea, nor do we have permits to allow us to fish there.

We oppose all four proposals. Proposals 14 through 16 would close the fishery without any thought to the thousands of lives that could be affected. Proposals 16 and 17 would change the bycatch and monitoring requirements which is unnecessary as ADF&G is already doing a fantastic job monitoring in this fishery. It has taken ADF&G, as well as us fishermen, years to implement.

The PWS fishery is already one of the most restrictive fisheries in the state. With by-catch caps at .05% rockfish and .04% for salmon, the average number of fish taken between 2021-2023 is 759 rockfish and 888 salmon compared to the average six million pounds of pollock taken.

The FV/ Alaska Beauty is an Electronic Monitored (EM) boat. We do not discard any fish at sea. All the boats that participate in the PWS fishery are either EM boats or carry at sea observers on board as part of the ODDS system when we fish in federal fisheries. Some boats have both EM and observers aboard. The state has the authority to put observers on boats fishing in the Sound. PWS pollock is one of the most highly managed fisheries we have in the state of Alaska.

In closing, I don't believe the proposers of any of these four proposals, 14-17, have thoroughly investigated the harm that these proposals will have on these resources, the processors, or the salmon smolt that may be eaten by the pollock if this fishery is closed. Closing the PWS pollock fishery could potentially damage another important fishery to us all: the salmon fishery.

Thank you for your consideration,
Curt and Avenue Waters,
Richard and Tami Starr
Owners & operators of the FV/ Alaska Beauty

Submitted by: Alicia Watkins

Community of Residence: Palmer, AK

Comment:

I just want to express how significantly it will impact me & my family's right to fairly & safely access the resource of salmon that this fishery provides. The possible total ban on dip net charters & other egregious proposal is disheartening & scary. We rely heavily on this resource & this specific means of acquiring it. We could not afford it if we were forced to have to purchase commercially caught fish. This precious, fresh, natural food source is even more important to my household (and many others) due to both my elderly parents having had/or currently fighting cancer. Due to the treatments for cancer they both developed peripheral neuropathy & are thus unable to fish for themselves. Please consider carefully each of the proposals before you & how they will affect each & every Alaskan.

Submitted by: Jay Wattenbarger

Community of Residence: Two Rivers

Comment:

I'm opposed to proposals that hinder dip netting opportunities without sound biological reasons

Submitted by: Jane Wehrheim

Community of Residence: Wasilla

Comment:

60) Oppose. Reducing the limit for salmon to 20/5 is not significant enough to have an effect on the overall salmon population but would defiantly have a negative effect on Alaskan families. Keeping it at 25 is ideal for my family as my "Salmon Math" is that number feeds us a delicious salmon meal once a week for a year. If needed, allocations can be altered on emergency/natural needs and we would be fully understanding.

64) Oppose. I should be able to dipnet at multiple locations as long as I stay within my limits.

67) Oppose. Common sense should tell you this is a ridiculous proposal. Obviously written by someone who has never fished.

68) OPPOSE! Dipnetting Charters provide a safe, effective, and efficient way to feed our families. Without them, more accidents will occur as people will still try to get their fish. I go out on a charter each year and am thoroughly impressed by the knowledge of the charter companies for navigating, respecting, and safely helping us get our catch.

Submitted by: Phillip Weidner

Community of Residence: Anchorage

Comment:

For the sake of our children and the long term outlook of Alaska, please reduce or eliminate trawling. We simply do not need this fishery and there is no science that supports it.

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 New Jersey, and while Alaska's salmon hatcheries haven't directly benefited me, they have provided salmon for me to eat. In today's world of food insecurity, production should not be slowed down, as long as it is not harmful to the earth. We should focus on finding ways to get this product to those in need. Proposal 78 would likely result in higher prices for salmon.

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 Weigel

[REDACTED]

New Jersey

Alaska Dept. of Fish & Game
 Alaska Board of Fisheries
 PO Box 115526
 1255 W. 8th Street
 Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

November 25, 2024

RE: Proposal 5 - 5 AAC 28.230. Lawful gear for Prince William Sound Area
Proposal 6 - 5 AAC 00.000. Regulation language goes here. 5 AAC 28.265. Prince William Sound Rockfish Mgmt Plan.
Proposal 14 - 5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan.
Proposal 15 - 5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan.
Proposal 16 - 5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan.
Proposal 17 - 5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan.

Chairman Carlson-Van Dort, Members of the Alaska Board of Fisheries,

Thank you for the opportunity to comment on the following Groundfish proposals. These comments are my own.

Proposal 5 – Oppose

I would like to share a few thoughts on rockfish bycatch and why I do not think that Proposal 5 is necessary at this time. I submitted RC032 opposing an Emergency Petition on Rockfish Bycatch for the October 2023 BOF Work Session and PC260 for the November 2023 Lower Cook Inlet meeting. Both are attached for your reference.

The comments I submitted then, remain relevant to the discussion surrounding Proposal 5 now. First, I would like to again point out that the harvest of rockfish from the commercial fishery generally stays within the GHL over the long term. This is confirmed by looking at the historic harvest patterns. A few key points stand out:

- The average rockfish harvest over the prior ten-year time period (2014-2023) was 124,365 pounds of the annual 150,000 lbs rockfish GHL¹. The average rockfish GHL was only exceeded in five of those ten years. In 2017, 2018, 2019, 2020 and 2021, the GHL was not achieved in the commercial fishery.
- Over the longer 20-year time interval (2004-2023), for harvest data within both the Inside and Outside districts of the PWS management area, the GHL was only exceeded those same five years in the past 20-year period².
- Table 2 of the ADF&G management report clearly shows that over time, the commercial fishery in PWS is generally living within the GHL over the long term.

¹ ADF&G PWS Rockfish GHL Table at

https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareapws.pws_groundfish_rockfish_harvest

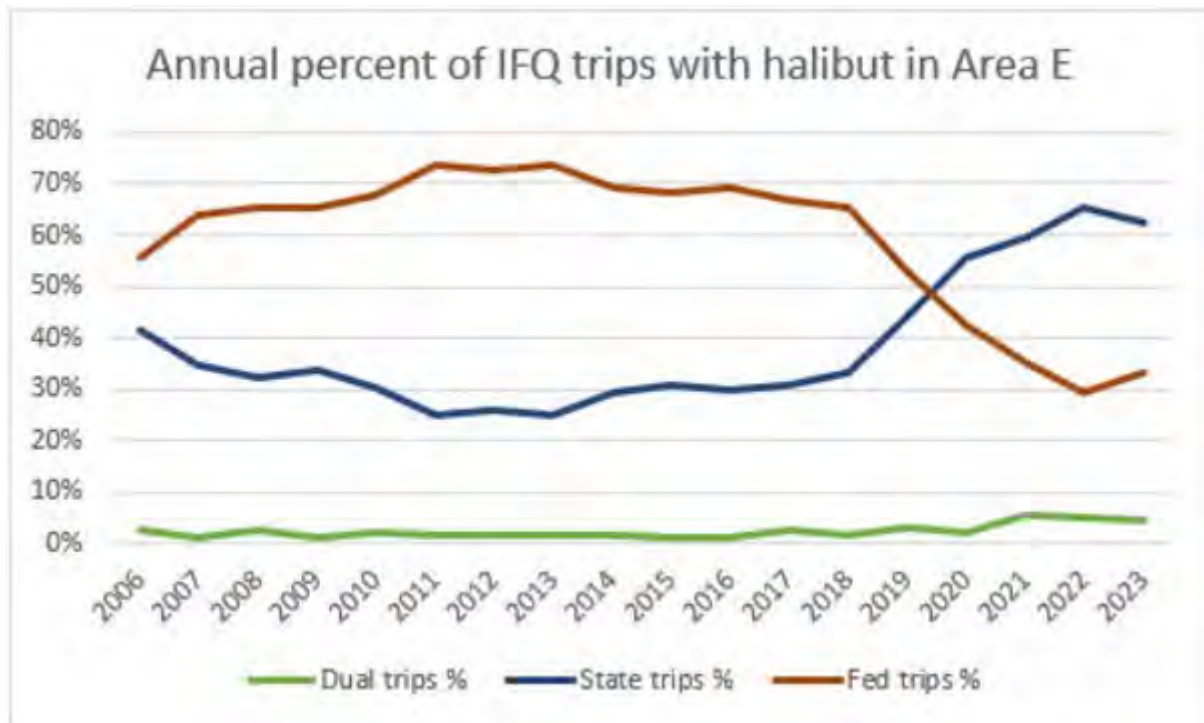
² ADF&G Prince William Sound Registration Area E Groundfish Fisheries Management Report, 2021–2023 Table 2

While recent years have seen an increase in rockfish harvest, these are offset with GHL shortfalls, some significantly for years within the same time periods. Total harvest for 2023 shows a total poundage of 163,254 pounds, unfortunately exceeding the GHL by 13,254 pounds. However, the 2024 harvest is again trending below the GHL with a little over 30 days left in the calendar year. As of November 25th, 2024, only 124,388 of the rockfish GHL has been taken. If one averages the year to date 2024 harvest and the 2023 harvest, the average harvest remains under the GHL by approximately 6,000 pounds for the two year period.

So why the spike in Rockfish landings? It is my belief, based on personal observation that beginning in 2018, a relatively high abundance of Pacific Halibut was found within Prince William Sound. This led to an increase in fishing effort, as catches in the Gulf of Alaska cooled and whale depredation forced some vessels off of their traditional grounds. Consequently, this shift led to much higher harvest rates of rockfish than would have been typically experienced if the fleet had stayed within its historic distribution and consisted of vessels typically employing hand baited longline fishing methods in PWS. Hand baiting results in less hooks fished per trip.

This correlation is confirmed by anecdotal logbook information shared by ADF&G staff, showing the annual percentage of just state waters IFQ trips with halibut, increasing in 2019, while the percentage of just federal IFQ trips with halibut declining. This correlation can be seen here:

Figure 1



When one looks at rockfish landings, a steep increase occurred and corresponding exceedances of the GHL were experienced in the 2021, 2022 and 2023 seasons.

While just a correlative observation, it's worth noting that this temporary change to fishing patterns likely played a significant role in this rapid rise in rockfish bycatch. It is my strong

feeling, that because halibut catches have begun to cool in the sound, a depressed sablefish price is resulting in less effort, and an increase in enforcement of existing rockfish landing and reporting requirements is occurring, these factors will bring catches of rockfish back within the GHL again over the long term. This is evident as presented by the YTD 2024 harvest numbers.

If adopted, I would respectfully request that the board condition the approval on ADF&G clearly stating the metrics to be used to determine area closures. These matter significantly to fishermen as halibut concentrate in the deeper waters of the sound. When the department closed stat areas in 2023, large areas of productive halibut grounds were lost for the remainder of the season with no explanation as to why those areas were selected. Methods of communication must be improved to allow fishermen to adjust fishing patterns in season to prevent closures. Finally, equal conservation measures must also be applied to area closures for all harvesters including sport.

I appreciate ADF&G concerns with rockfish conservation. They are my own as well, because I fish a small boat and do not have the options to weather off shore fishing if sound waters are closed. However, it is my opinion that ADF&G has the tools currently to manage temporary rockfish exceedances within the sound without the adoption of Proposal 5. Please reject Proposal 5.

Proposal 6 – Support

This would give fishermen the ability to return rockfish to sea using the deepwater release mechanism method already approved for the sport fishery. It would provide a good tool, especially when using mechanical jig in relatively shallow waters, to release rockfish unharmed. This method has shown to have a high survival rate and be effective in reducing mortality. Please support Proposal 6

Proposal 14, 15 & 16 – Oppose

The Prince William Sound Walleye Pollock pelagic trawl fishery is a viable fishery that provides winter work for fishermen and income for coastal Alaska communities. While bycatch is always a concern, numbers of rockfish and salmon that are harvested in this fishery are relatively low in comparison to larger Gulf of Alaska and Bering Sea trawl fisheries.

The biomass of Walleye Pollack in PWS is significant. Annual harvests of 4-9 million pounds occur regularly. Pollock are consumers of zooplankton and known to be piscivorous at larger sizes, feeding on small fish in the water column. Predation on juvenile herring, salmon and other food fish are a concern if left unchecked. It is my humble opinion that the impacts of allowing this biomass to go unharvested is far more damaging to other PWS species, than allowing a well-managed fishery to occur. I support clean trawling and efforts to reduce bycatch, however closing a fishery entirely is not warranted at this time. Please reject proposals 14, 15 and 16.

Proposal 17 – Support

I would support increased observer coverage for the PWS Pollock fishery with amendments. I believe that a reasonable level of observer coverage is necessary and should be worked out in committee with ADF&G and industry. Please support Proposal 16 with amendments.

Thank you for your considerations,

Sincerely



Mike Wells

Year	Dual trips	State trips	Fed trips	Total trips	Dual trips %	State trips %	Fed trips %
2006	11	189	253	453	2%	42%	56%
2007	8	224	415	647	1%	35%	64%
2008	16	202	411	629	3%	32%	65%
2009	5	185	356	546	1%	34%	65%
2010	11	159	354	524	2%	30%	68%
2011	7	115	338	460	2%	25%	73%
2012	7	115	323	445	2%	26%	73%
2013	7	114	336	457	2%	25%	74%
2014	5	103	246	354	1%	29%	69%
2015	4	111	245	360	1%	31%	68%
2016	4	117	274	395	1%	30%	69%
2017	9	109	238	356	3%	31%	67%
2018	5	128	252	385	1%	33%	65%
2019	11	168	199	378	3%	44%	53%
2020	6	185	141	332	2%	56%	42%
2021	22	249	146	417	5%	60%	35%
2022	23	296	133	452	5%	65%	29%
2023	16	230	121	367	4%	63%	33%

Table to support Figure 1

Note: This information should be considered anecdotal unless formally submitted by ADF&G Ground fish staff.

November 13, 2023

Alaska Board of Fisheries
Alaska Department of Fish and Game



RE: Board Generated Proposal for Rockfish Conservation

Chairman Wood and Members of the Board of Fisheries,

It is my understanding that the Board of Fisheries will introduce a Board Generated Proposal granting the Alaska Department of Fish and Game (ADF&G) permanent regulatory authority to close state waters to commercial fishing for the purpose of rockfish conservation. **I would respectfully ask the board not pass this proposal when presented.**

I support the department's efforts to protect rockfish as they are generally considered a long lived and slowly maturing species. However, as I stated in my attached comments (RC32) submitted for the BOF October 12, 2023 work session, I question the actual need for such conservation measures, particularly for Prince William Sound (PWS).

As I stated previously, the average rockfish harvest over the prior ten-year time period (2013-2022) was 122,961 lbs of the annual 150,000 lbs rockfish GHF. The average rockfish GHF was only exceeded in five of those ten years. In 2017, 2018, 2019, 2020 and 2021, the GHF was not achieved in the commercial fishery. When one looks at the longer 20-year time interval (2003-2022), for harvest data within both the Inside and Outside districts of the PWS management area, the GHF was only exceeded those same five years in the past 20-year period.¹ Table 2 of the ADF&G management report clearly shows that over time, the commercial fishery in PWS is generally living within the GHF.

The emergency petition the board granted at its October 12th work session, provided a temporary emergency order allowing closure of the longline fisheries in PWS in five statistical areas for the remainder of 2023. I would note that the department's closure resulted in the removal of the most traditionally productive areas in the sound for halibut fishing.

Before granting permanent regulatory authority to close fisheries, there is significant work and stakeholder engagement ADF&G can do to bring an awareness to commercial fishermen to reduce the overharvest of rockfish. Communicating to the fleet which statistical areas are showing high rates of harvest, rather than simply asking fishermen to avoid areas of high rockfish concentration, would give fishermen the ability to work with ADF&G in-season by changing fishing practices. Improving communication with those who are involved in fisheries such as Pacific Halibut, about state regulations on rockfish management is an important first step for those involved in federal fisheries.

Regulations for trip limits and full retention found in 5AAC 28.265 may be in conflict with each other. With the current bycatch caps in the sound and required forfeiture of rockfish overages to the state, there is no monetary incentive for fishermen to bring in any more rockfish than currently allowed as bycatch. However, with the full retention required under 5AAC 28.265, these fish must be retained and landed.

Extended closures of areas will have a huge impact on the small boat commercial fleet. PWS is home to many fishermen, such as myself who has fished PWS exclusively for nearly four decades. Closing

¹ ADF&G Fisheries management Report No. 21.03 Prince William Sound Area E Ground Fisheries Management Report, 2017-2020, Table 2

large areas of the sound and telling fishermen to go harvest halibut in federal waters is not reasonable or safe. Like many others, I have a small vessel (33 feet). Because of this I have a vested interest in working with ADF&G to preserve my fishing access to the sound. I would recommend that ADF&G work with CDFU and other fishermen to address the departments concerns before permanently granting regulatory authority to close fishing area.

26

Finally, the intended schedule for hearing a proposal and its proposed deliberation in Kodiak does not support strong public participation, given the location and cost to attend. If the board chooses to generate a proposal, I would respectfully ask that it be added to an upcoming work session or the 2024 PWS Finfish meeting. There is no hurry to rush a proposal through given the ability of the department to request another emergency petition or an extension of this existing one until then.

For all of these reasons, I am urging all BOF members to vote against a board generated proposal delegating permanent regulatory authority to ADF&G for the purpose of closing fishing areas for rockfish conservation. Let's give industry the opportunity to collaborate with ADF&G to fix this issue first.

Sincerely



Mike Wells

October 12, 2023

Alaska Dept. of Fish & Game
Alaska Board of Fisheries



RE: ADF&G Emergency Petition on Rockfish Bycatch

Chairman Wood, members of the Alaska Board of Fisheries;

My name is Mike Wells and I am a commercial halibut longliner who fishes exclusively in Prince William Sound, and have done so since approximately 1984. Over the last 40 years, I have participated in halibut, sablefish and pacific cod longline and pot fisheries and directed mechanical jig fisheries for rockfish in the sound.

I am writing these comments today with very short notice, after becoming aware of ADF&G's Emergency Petition and requested action by the Board of Fish to delegate authority to the Commissioner under 5 AAC 28.050 Lawful Gear for Groundfish, to close areas to commercial fishing with specific gear types by emergency order just yesterday. You will find these comments submitted as RC, because there was no opportunity to address this petition through the regular public comment period.

Given the date of Commissioner Vincent Lang's letter to Chairman Carlson Van-Dort of October 6th 2023, it is clear that this emergency petition was submitted well after the public comment period closed on September 27th for the Board's scheduled work session. It appears that there has been no public process on a petition that will have far reaching implications on the small boat commercial fishermen of Prince William Sound and elsewhere.

I would like to bring to the board's attention a few items for consideration:

This emergency petition seeks to promulgate regulation to close areas of Prince William Sound to directed commercial fishing because the 2023 rockfish GHL has been exceeded. The department is concerned that further rock fish harvests will occur given the remaining halibut season. While this is true, to date the total recorded catch of commercial rockfish for all fisheries has only exceeded the GHL by 8% or 12,000 pounds. When one looks at the average rockfish harvest over the previous ten-year time period (2013-2022) the average rockfish GHL was only exceeded in five of those ten years. In fact, in five of those years, 2017, 2018, 2019, 2020 and 2021, the GHL was not achieved in the commercial fishery. Over the entire ten-year period, considering the ups and downs of the fishery, the average harvest was 122,961 lbs of the annual 150,000 lbs rockfish GHL. I have attached a table from the ADF&G website showing these figures.

I would also like to point out that the emergency petition only seeks to close areas for commercial fisheries. The petition and the concerns listed within the commissioner's letter does not address the harvest and potential overharvest of rockfish in PWS by the sport and guided sport fishery. Having lived and worked there most of my life, it is clear to everyone in the sound that the unchecked influx of recreational fishing provided by the completion of the Whittier tunnel is beginning to have an effect on the sound. In addition, guided sport operators have had to broaden their targeted species to rockfish and even squid to book full trips given restrictions on halibut bag limits. Any conservation measures to limit the harvest of rockfish in the sound or elsewhere in Alaska must be shared by all user groups.

I would respectfully challenge the departments long held statements that the rockfish population is slow growing, extremely localized and in eminent danger of collapse. I believe the GHL table for state managed fisheries in PWS speaks for itself. How can rockfish species, subjected to commercial fishing methods of pot, longline and trawl gear, along with guided sport and uncontained sport fishing pressure even remain at harvestable levels given this theory? When in fact, the attached GHL table shows an increasing harvest from 2017 to 2023. I would suggest that the rockfish stocks in the sound are relatively stable, are replenished from outside the sound and potentially even on the increase. Possibly the department should consider reevaluating its GHL because of evidenced harvest abundance before requesting authority to close areas of PWS to federally managed fisheries.

I commend ADF&G for its efforts to conserve this important resource. However, I respectfully **oppose the adoption of ADF&G Emergency Petition on Rockfish Bycatch**, for the following reasons:

- The petition has not been fairly noticed to the public and those that will be affected.
- The data does not show an immediate conservation need
- The emergency petition does not address the totality of rockfish harvesting by all user groups in PWS.
- Closing areas to commercial fishing, which concentrates harvest effort in open areas rarely leads to a net gain for conservation. This was most recently evidenced by the departments effort to restart the PWS tanner crab fishery.
- I would strongly recommend that ADF&G form a work group to include the user groups to look at the rock fishery in PWS and come up with recommendations that reasonably address the Commissioners concerns.

Thank you for the opportunity to provide comment.

Sincerely



Mike Wells



From web page ADF&G/ PWS/Groundfish/Harvest - dated October 12, 2023

Prince William Sound Rockfish

Guideline harvest level (GHL) and Harvest are round weight in pounds.

Year ▲ ▼	GHL	State Managed Harvest
2023	150,000	162,138
2022	150,000	196,843
2021	150,000	142,136
2020	150,000	82,234
2019	150,000	71,976
2018	150,000	56,452
2017	150,000	59,714
2016	150,000	161,510
2015	150,000	152,128
2014	150,000	157,458
2013	150,000	149,161
2012	150,000	113,877
2011	150,000	118,755
2010	150,000	104,901

There is no directed rockfish fishery - retained as bycatch to other directed groundfish and halibut fisheries.

Includes black and dark rockfish from federal waters. Mandatory retention required for all rockfish in PWS.

Submitted by: Richard White

Community of Residence: Anchorage

Comment:

I am opposing Proposals 63, 64. 65 because they will adversely affect my ability to harvest a small, reasonable quantity of salmon to feed my family.

Submitted by: Kurt Whitehead

Community of Residence: Klawock

Comment:

I support this proposal.

The trawl fleet nets are indiscriminate killers. They are negatively impacting every Alaskan resident and our resources.

The 2023 trawl fleet bycatch totals:

35,655 King Salmon

122,279 Chum Salmon

4.4 million lbs. of halibut

1.14 million crabs

7.3 million lbs. of herring

9 orcas

All caught by trawlers...

Submitted by: Cole Wibbels

Community of Residence: North Pole Alaska

Comment:

Please stop the trawlers from disturbing the sea bed. This is just one more added pressure to our fishing grounds that would be easily alleviated.

Submitted by: Lani widel

Community of Residence: fairbanks

Comment:

Proposal 16 + proposal 15, trawling statewide should be shutdown for 7 years, so we can go fishing in the rivers with fishing poles again. 7 years will give salmon a chance to multiply in the rivers again, no more shutdowns on the rivers. The Yukon river has shutdown of 7 years. So its only fair All Trawling Statewide Alaska shutdown for 7 years.

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

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 and 2nd generation salmon fisherman. I participate in the Area E drift gillnet, purse seine, shrimp, sea cucumber, and tanner crab 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,

Nathan Widmann

A solid black rectangular box used to redact the signature of Nathan Widmann.

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:


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 opposition to Proposal 78. I am fortunate to be a member of a fourth-generation commercial fishing family, many of whom depend on the fishery resources of Prince William Sound. Seine catches were very small in the seventies, prior to the state initiating opportunities for hatcheries to be built. The hatcheries have proved themselves over the past years, providing increased fish numbers for the commercial, subsistence, and sport fisheries, contributing revenue to the economies of PWS communities, and providing employment to many. The hatcheries undergo annual review by Regional Planning Teams in coordination with the Alaska Department of Fish and Game, ensuring the goal of resource sustainability. A decrease in hatchery production would have serious consequences on the economy of my community, my neighbors, my family, and other communities and their residents in PWS. I feel a great deal more scientific data should be required before any consideration is given to decreasing hatchery production in any amount.

Sincerely,
Cecilia Wiese


Cordova, Alaska

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'm fortunate to be a member of a fourth-generation commercial fishing family, many of whom depend on the fishery resources of Prince William Sound. Seine catches were very small in the seventies, prior to the state initiating opportunities for hatcheries to be built. The hatcheries have proved themselves over the past years, providing increased fish numbers for the commercial, subsistence, and sport fisheries, contributing revenue to the economies of PWS communities, and providing employment to many. The hatcheries undergo annual review by Regional Planning Teams in coordination with the Alaska Department of Fish and Game, ensuring the goal of resource sustainability. A decrease in hatchery production would have serious consequences on the economy of my community, my neighbors, my family, and other communities and their residents in PWS. I feel a great deal more scientific data should be required before any consideration is given to decreasing hatchery production in any amount.

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,
Cecilia Wiese


Cordova, Alaska

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 fisherman since before 1972. The hatcheries have kept a much larger supply of sustainable salmon in markets to compete in the world market! A decrease in egg take by 25% would impact me and my business; On a good year of ocean survival it would probably be just as important as on a poor year of ocean survival!

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 P Wiese

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

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

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 a 67 year old lifelong resident of Cordova and actually born in the territory of Ak in 1957. I began fishing in my parents' family fishing operations in 1965 as an active crew person. In 1972 I received a CFEC salmon gillnet permit card and seined with my father when seine season arrived in early July. A 2-4 million fish average-pink run was what we fished on following the 1964 earthquake which raised the land masses and fish spawning beds 8'- 24' in most of Copper River/PWS. In the mid seventies I spent many days helping to load / offload supplies headed to Port San Juan salmon hatchery which was the first of the hatcheries in the sound which boosted salmon production to a point of sustained yield that created revenues to build hatcheries and vessels to support what we have today! I feel that we have survived over half a century of sustainability with most of our fisheries and hope that ADFG/BOF process can help keep us on track giving us a fair and equitable livelihood.

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 P Wiese



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 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

PC650

Submitted by: Joshua Wilcox

Community of Residence: Eagle River

Comment:

The fish my family harvest from dip netting the Copper River is a vital resource my family's survival here in Alaska. The cost of living in Alaska is very high. Using the resources that Alaska provides truly sustains lives. My family takes great pride in the harvest of our fish from dip netting and other means. None of it goes to waste. Without this blessing in our life, we wouldn't be able to afford to life in this wonderful state. Taking away or restricting this resource for the intent of commercial fisheries to make more of a profit would be very short sided.

PC651

Submitted by: Nathan Williams

Community of Residence: Fairbanks

Comment:

I am 55 years old and spent my first day at Chitna when 2 weeks old end of July 1969. The public dipnet is culturally important and good way to get food for your family. My children are youn adults now and fish there yearly. Dont cha ge the rules or limits much so we can all still enjoy this Alaskan resource and our families futures forevermore. Limit the commercial fishing if you need to preserve the run.

Ok

PC652

Submitted by: Charles Willoughby

Community of Residence: Wasilla

Comment:

See below

Proposal 47-51,55,60-63,65-71

Submitted by: Kevin Winker

Community of Residence: Fairbanks

Comment:

Our family considers the personal-use dip-net fishery of Copper River red salmon to be a critical component of our family's sustenance and thus of life. Any other use for that fishery to us is a distant second. Although commercial gain is great when it can be sustained, the personal use of this fishery for Alaskans to live on during the whole year is more important. So I support the Chitina Dipnetters Association position of supporting proposals 48, 51, 52, 53, 58, 59, and 70. I oppose proposals 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60-69, and 71.

Sincerely,

Kevin Winker

Opposition to the Proposal 78 for Reducing Pink Salmon Egg Take Levels in Prince William Sound

Dear Members of the Board,

I am writing to express my strong opposition to the proposal to reduce the permitted pink salmon egg take levels by 25% in Prince William Sound hatcheries. While the intent behind the proposal is commendable—aiming to address concerns about declining salmon stocks, particularly Chinook—this approach is not only misguided but also counterproductive to the long-term sustainability of our fisheries.

First and foremost, the proposal oversimplifies a complex issue. The decline of salmon stocks, including Chinook, is influenced by a myriad of factors, and attributing these declines predominantly to hatchery practices fails to recognize the broader ecological context. While hatcheries play a role, other significant factors must also be considered, including climate change, habitat degradation, bycatch, and disease. Focusing solely on hatchery egg take levels neglects the multifaceted nature of the problem and ignores the potential consequences of reduced hatchery production.

Reducing egg take levels by 25% could have detrimental effects on the overall salmon population in Prince William Sound. Hatcheries serve a critical role in sustaining salmon populations, especially in the face of environmental changes and declining wild stock numbers. A reduction in hatchery production could lead to a decrease in the number of salmon returning to spawn, further exacerbating the challenges we face. This could create a feedback loop, where fewer hatchery fish lead to more significant declines in both hatchery and wild stocks.

Moreover, the proposal suggests a five-year evaluation period. This timeline is inadequate for assessing the long-term impacts of such a significant reduction in hatchery production. Salmon populations are influenced by a range of factors that fluctuate over time. A short-term evaluation may not provide a comprehensive understanding of the consequences of the proposed reduction and could lead to irreversible damage to our salmon fisheries.

It is also essential to consider the socioeconomic implications of this proposal. The fishing industry is a vital part of the Alaskan economy, providing livelihoods for countless individuals and communities. Reducing hatchery production could

jeopardize jobs and economic stability, particularly in rural areas that rely heavily on fishing. The potential loss of revenue and employment opportunities must be weighed carefully against the unproven benefits of this proposal.

Finally, it is crucial to emphasize that hatcheries have made significant contributions to the recovery of salmon stocks in various regions. Evidence from other areas shows that well-managed hatchery programs can coexist with wild populations and support their overall health. Instead of implementing drastic reductions, we should focus on improving hatchery management practices, monitoring, and research to better understand the interactions between hatchery and wild stocks.

In conclusion, while the concerns regarding salmon declines are valid, the proposed reduction in hatchery egg take levels is not the appropriate solution. It is essential to adopt a more holistic approach that considers all contributing factors, enhances hatchery management, and supports the sustainability of both wild and hatchery salmon populations. I urge you to reject this proposal and consider alternative strategies that promote the health of our salmon fisheries and the communities that depend on them.

Sincerely,

Jake wise F/V
Silver Streak

Opposition to the Proposal 77 for Enhanced Salmon Allocation Plan Revision

Dear Members of the Board,

I am writing to express my strong opposition to the proposal regarding the enhancement of salmon allocation in the Prince William Sound (PWS) region, as outlined in 5 AAC 24.370 and 5 AAC 33.364. While the intent of the proposal aims to create a more inclusive allocation plan for enhanced salmon, it ultimately undermines the established principles of fairness and reasonableness that these regulations are designed to uphold.

First and foremost, the proposal suggests that the current allocation plan is inadequate because it does not account for all enhanced salmon produced in the

region, particularly in regard to the value generated by the Valdez Fisheries Development Association (VFDA). However, it is essential to recognize that the existing allocation framework has been carefully crafted over the past 19 years to balance the interests of various user groups, including drift gillnet, seine, and set gillnet fisheries. Revising the plan to retroactively include additional enhanced salmon without a thorough evaluation of the implications can lead to unintended consequences, including increased conflict among user groups and destabilization of the fisheries.

Furthermore, the assertion that public funds used for the construction and operation of hatcheries necessitate an equal allocation of enhanced salmon resources overlooks the fundamental differences in how these facilities operate and contribute to the fisheries. Each hatchery, including those operated by PWSAC, VFDA, and other entities, has specific production goals and management strategies tailored to the ecological and economic dynamics of its associated fishery. A one-size-fits-all approach to allocation would not only be impractical but could dilute the effectiveness of existing enhancement programs, jeopardizing their contributions to local economies and ecosystems.

The proposal also implies that VFDA's production of enhanced salmon should be distributed more broadly among all user groups, potentially undermining the historical rights and allocations established for specific commercial fisheries. This raises serious concerns about fairness and equity in resource management. The historic allocation patterns have developed in response to local needs, fishing practices, and ecological considerations, and any changes must be approached with caution and thorough stakeholder consultation.

Moreover, the proposed review of the allocation plan must include a comprehensive evaluation of the social, economic, and ecological impacts of potential changes. Simply adding the value of all enhanced salmon to the regional plan without a detailed analysis could lead to a skewed understanding of the overall health and sustainability of the fisheries. Stakeholders deserve a transparent and inclusive process that considers the long-term viability of the fishery, rather than a hurried revision that lacks adequate justification.

Finally, while the desire to create a complete and inclusive regional plan is commendable, it is crucial to proceed with caution. Rather than rushing to revise the existing framework, I urge the Board to maintain the current allocation plan while engaging in a thorough and thoughtful review process. This should involve all

stakeholder groups, ensuring that any changes made are based on sound science, equitable principles, and a comprehensive understanding of the fisheries landscape.

In conclusion, I respectfully oppose the proposal to revise the enhanced salmon allocation plan in Prince William Sound. The existing framework has served its purpose well and should not be altered without careful consideration of the potential risks and consequences. I encourage the Board to prioritize a balanced, fair, and collaborative approach to fisheries management that respects the historical rights of all user groups.

Thank you for your attention to this important matter.

Sincerely,

Jake wise
F/V Silver Streak

Opposition to Proposal 76 for Amendments to the Prince William Sound
Management and Salmon Enhancement Allocation Plan

Dear Members of the Board,

I am writing to formally oppose the proposal submitted by Darin Gilman to amend the Prince William Sound Management and Salmon Enhancement Allocation Plan. While the intent behind increasing access to the Port Chalmers Subdistrict for drift gillnet permit holders is understandable, I believe that this proposal is fundamentally flawed and would have negative consequences for the overall health of our fisheries and the equitable management of salmon resources.

First and foremost, the proposed amendment to allow drift gillnetters exclusive access to the Port Chalmers Subdistrict based on a 50% threshold of the previous five-year average exvessel value raises significant concerns about equity among user groups. This change would create an imbalance in the allocation of enhanced salmon resources and could foster unnecessary conflict between the drift gillnet and purse seine fleets. The current management plan aims to provide a fair allocation of resources, and any amendments should prioritize the maintenance of this balance rather than tilt the scales in favor of one user group at the expense of another.

Moreover, the assertion that the drift fleet is at a disadvantage, as indicated by the \$68 million gap in harvest value compared to the seine fleet, requires a more nuanced examination. While it is important to acknowledge disparities in harvest value, simply increasing access for the drift fleet does not address the root causes of these disparities. Factors such as market conditions, fishing practices, and environmental influences all play critical roles in determining the success of different gear groups. Addressing these underlying factors through research and collaboration would be a more productive approach than altering access and allocation rules.

Additionally, the proposal to eliminate the seine fleet's access to the Esther Subdistrict for Prince William Sound Aquaculture chums is concerning. This change would not only limit the opportunities for purse seiners but also undermine the collaborative management approach that has guided our fisheries for nearly two decades. The intent of parity among user groups should not come at the cost of diminishing the operational flexibility of the seine fleet. A healthy fishery relies on all user groups' ability to adapt and respond to changing conditions, and this proposal would restrict that adaptability.

It is also critical to note that the current five-year rolling average system has been designed to promote stability and predictability in fishery management. Amending this system without thorough stakeholder engagement and scientific evaluation could lead to unintended consequences, including overfishing and destabilization of the salmon population. Any proposed changes should be made through a comprehensive review process that includes input from all stakeholders, ensuring that decisions are grounded in sound science and equitable principles.

In conclusion, while the intention behind the proposal to amend the Prince William Sound Management and Salmon Enhancement Allocation Plan is to address perceived inequities between user groups, the approach outlined in this proposal is not the solution. Instead of modifying access rights and allocation percentages, I urge the Board to focus on collaborative solutions that address the underlying factors contributing to disparities in harvest value. We must prioritize the long-term sustainability of our fisheries and the equitable treatment of all user groups.

Thank you for considering my opposition to this proposal. I hope the Board will take a cautious and inclusive approach to fisheries management that supports the health and sustainability of Prince William Sound's salmon resources.

Sincerely,

Jake wise

F/v silver streak

Opposition to Proposal 75 – Amendments to the Prince William Sound Management and Salmon Enhancement Allocation Plan

Dear Members of the Board,

I am writing to express my strong opposition to Proposal 75, which seeks to amend the Prince William Sound Management and Salmon Enhancement Allocation Plan. While I understand the frustrations expressed by those advocating for the drift gillnet fleet, the proposed changes are not a viable solution to the challenges facing the fishery. Instead, this proposal risks exacerbating existing tensions between user groups and undermining the cooperative management principles that have guided our fisheries for nearly two decades.

The fundamental flaw in this proposal is the call to replace the current five-year rolling average with a cumulative average since the inception of the plan in 2006. This change would distort the intended balance within the fishery management framework. The five-year average is designed to provide a dynamic reflection of current conditions, allowing for adjustments based on recent data and trends. By shifting to an aggregate average that spans nearly two decades, the proposal would create an artificial and outdated benchmark, failing to account for the complexities of the fishery and the changing environmental conditions affecting salmon populations.

Furthermore, the argument that the drift fleet has been systematically denied its fair share of enhanced salmon revenue overlooks the necessity of a balanced approach to resource allocation. The allocation plan aims to promote fairness among all user groups, and any attempt to redefine access based solely on perceived losses fails to consider the broader context. The seine fleet's access to enhanced salmon resources is not only a reflection of their operational capacity but also an acknowledgment of their role in maintaining the overall health of the fishery. Creating exclusive access for one gear type in the Port Chalmers Subdistrict would further entrench divisions within the fishing community and set a dangerous precedent for future resource management discussions.

Moreover, the proposal to eliminate the Esther Subdistrict from the allocation plan raises significant concerns about the sustainability of the fishery. The Esther Subdistrict plays a vital role in the overall ecosystem and fishery management strategy. By removing it from the plan, we risk undermining the collaborative efforts that have worked to ensure the long-term viability of salmon stocks in the region. The health of our fisheries must take precedence over individual user group interests, and successful management requires a holistic understanding of the interconnectedness of salmon populations and their habitats.

It is crucial to recognize that the drift fleet's recent challenges stem from a variety of factors, including environmental changes, market fluctuations, and fishing practices—not solely from the allocation plan itself. Instead of advocating for exclusive access based on past revenue losses, I urge stakeholders to work collaboratively to address the underlying issues facing the drift fishery. This approach could include exploring new enhancement strategies, improving habitat conditions, and developing sustainable fishing practices that benefit all user groups.

In conclusion, while I acknowledge the concerns raised by Proposal 75, I believe that the proposed amendments would do more harm than good. Instead of fostering cooperation and understanding among user groups, this proposal risks deepening divides and compromising the integrity of our fisheries management system. I strongly urge the Board to reject this proposal and instead focus on inclusive strategies that promote collaboration and equitable resource management for all stakeholders in the Prince William Sound region.

Thank you for your consideration.

Sincerely,

[Your Name]

[Your Affiliation/Organization]

[Your Contact Information]

Submitted by: Kodey Wolf

Community of Residence: Wasilla

Comment:

This trawl fishery needs to be shut down. They are ruining an entire ecosystem without care. Once the ecosystem has died and there are no more fish they will simply move onto the next, easy as that. This is out of control and needs to be stopped.

Submitted by: David Woo

Community of Residence: Fairbanks

Comment:

My name is David Woo. I am 28 years old and am preparing for my second season as a skipper on a PWS seiner. I am writing to comment on proposals 73, 74, 75, 76, 77 and 78.

I support proposals 73 and 74. Decreasing the number of boats will increase the catch per boat. This will make it easier for young fisherman like me to produce enough fish to make ends meet in an industry that continues to grow exceedingly expensive to participate in. While it may make the fishery more expensive to buy into, I feel that can be addressed through the state loan program.

I oppose proposals 75, 76, 77, and 78. I feel that the allocation plan has been successful so far and do not see a reason to change it. In addition to that, decreasing the hatchery egg takes would be a crass decision based on inconclusive science. I agree with the ADFG's comments on the issue.

Submitted by: Daniel Woroniecki

Community of Residence: Wasilla

Comment:

This proposal is a great first step in correcting the damage trawling causes to Alaska's fishing populations. Stopping the damage they cause to the sea floor and the wanton waste from their bycatch are detrimental to Alaska future resources



United States Department of the Interior

NATIONAL PARK SERVICE

Wrangell-St. Elias National Park & Preserve
 Mile 106.8 Richardson Hwy. P.O. Box 439
 Copper Center, AK 99573-0439
 907 822 5234 Fax 907 822 3281
<http://www.nps.gov/wrst>



IN REPLY REFER TO:

1.A.2

Nov 26 2024

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

Dear Members of the Board:

The Copper River system supports numerous genetically diverse populations of salmon, including most importantly sockeye and Chinook salmon. Our foundation of knowledge – traditional, indigenous, scientific – tells the story that early-run salmon in the Copper River belong *principally* to populations destined for the Upper Copper River drainage, including rivers and lakes within Wrangell-St. Elias National Park and Preserve.

We provide detailed information that will demonstrate:

1. Copper River sockeye and Chinook salmon are concerning in decline.
2. A preponderance of evidence suggests that the early-run populations of salmon with fidelity to the upper reaches of the drainage are negatively affected by persistent, disproportionate early-season harvest before the salmon enter the river.
3. Back-testing Proposal 51's decision rule demonstrates its effectiveness in mitigating the circumstances described above while benefiting escapement during low-run years.

Proposal 51, if adopted, would establish a *decision rule* to ensure sustainability of early-run salmon primarily destined to the Upper Copper River drainage. Specifically, we recommend that the board revise the Copper River District Management Plan, 5 AAC 24.360 as follows:

(e) The department shall manage the Copper River District commercial salmon fishery to conserve and avoid disproportionate exploitation of early-run Copper River sockeye and king salmon stocks by comparing cumulative sonar passage and management objectives by date, as follows:

(1) After two commercial drift gillnet openings, the Copper River District shall not open to commercial drift gillnet fishing when cumulative sonar passage is less than 70 percent of the cumulative management objective for the same date.

This proposal is fully consistent with the stated intent of the Alaska Department of Fish and Game (ADF&G or department) to manage the commercial fishery in a manner that “... allows for proportional representation of each segment of the run in the escapement” (ADF&G 2024:133) and addresses concerns about uneven harvest by ensuring that commercial harvest timing better aligns with early-component run timing. The table below illustrates the trend in timing of commercial openers in the Copper River District prior to salmon passage as monitored at Miles Lake sonar reaching 70 percent of the cumulative Copper River management objective for the date, per the Proposal 51 decision rule. This summary table is one of several ways we will illustrate disproportionately high exploitation rates of early-run salmon stocks that require mitigation measures to be consistent with existing policy and best practices.

Trend in average number of commercial openers prior to Miles Lake sonar passage reaching 70 percent of the cumulative Copper River management objective for the date

10-year average (2005-2014)	2.5 openers
10-year average (2015-2024)	2.8 openers
5-year average (2020-2024)	4.8 openers

Source: ADF&G, annual Prince William Sound Area Finfish Management Reports for years 2005-2023 and preliminary inseason data for 2024 provided to the public via ADF&G websites.

Consistent with the state’s Policy for the Management of Mixed Stock Salmon Fisheries (5 AAC 39.220) and the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222), Proposal 51 creates a decision rule to protect all components of the run. Maintaining the full components of the run not only meets policy for protections of the salmon populations; it also fulfills obligations to subsistence users as identified by Congress in the establishment of Wrangell-St. Elias National Park and Preserve.

Members of the board, we recognize that management of Copper River salmon fisheries is complex, yet in the context of the issue that we seek to address, **there are several signals that together warrant increasing concern for the status of Copper River salmon populations and fisheries. These signals (detailed in Attachments A-E, and summarized as an *Assessment Summary Score Card* at the beginning of Attachment A) add weight to our request that the board act to adopt Proposal 51 in alignment with the *precautionary approach* outlined in the Policy for the Management of Sustainable Salmon Fisheries (5 AAC 39.222(c)(5)).** This policy specifies in part that “... in the face of uncertainty, salmon stocks, fisheries ... shall be managed conservatively ... [following] ... a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and ... the biological, social, cultural, and economic risks, and the need to take action with incomplete knowledge ...”

As stated in Proposal 51, we are *sincerely respectful of all user groups* that are reliant on Copper River salmon. With salmon numbers in decline, it is important, more than ever, that we work together to protect all populations and components of the run – upriver and downriver – to keep this fishery resilient or we risk going the way of the Yukon and Kuskokwim Rivers. Proposal 51 is consistent with concerns expressed by the Wrangell-St. Elias Subsistence Resource Commission in multiple letters to the Governor and the Secretary of Interior (letters included as Attachment F: 2021, 2022, 2023, 2024). The proposal addresses numerous stakeholder food security concerns and is a strategic first step forward in response to the following substantive supporting documentation (see below) of existing conditions that compel management action.

Thank you for your consideration of these comments and your support for the long-term conservation of Copper River sockeye and Chinook salmon populations and the livelihoods that depend upon them.

Sincerely,

BENNY BOBOWSKI
Digitally signed by BENNY BOBOWSKI
Date: 2024.11.26 08:15:49 -09'00'

Ben Bobowski, Ph.D.
Superintendent

MARK MILLER
Digitally signed by MARK MILLER
Date: 2024.11.26 10:09:50 -07'00'

Mark E. Miller, Ph.D.
Ecologist

Attachments

- Att. A. Assessment of the Issue (including Assessment Summary Score Card)
- Att. B. References Cited
- Att. C. Map of the Glennallen Subdistrict and tables summarizing and comparing measures of participation and harvest (total salmon) in State and Federal subsistence fisheries in three reaches of the Glennallen Subdistrict for years 2004-2023.
- Att. D. Figures illustrating annual daily and cumulative curves for Miles Lake sonar passage (observed passage and management objectives for passage) for years 2003-2024, superimposed with Copper River District commercial harvest amounts (total salmon) by period, also illustrating how the proposed decision rule (Proposal 51) might have affected commercial harvest management and salmon passage upriver.
- Att. E. Tables summarizing and comparing observed sonar passage with management objectives for sonar passage (“sonar balance”), commercial harvest, and the balance between observed sonar passage and commercial harvest (“sonar-harvest balance”) for statistical weeks 20-31 (early-mid. May through the end of July) for years 2003-2024.
- Att. F. Letters of Concern, Wrangell-St. Elias Subsistence Resource Commission





cc: Sarah Creachbaum, Regional Director, NPS Region 11 (Alaska)
Grant Hilderbrand, Associate Regional Director for Resources, NPS Region 11 (Alaska)
Crystal Leonetti, Director (Acting), Office of Subsistence Management

Attachment A – Assessment of the Issue

Assessment Summary Score Card

*KEY: Arrow up=increasing trend; Arrow down=decreasing trend; green=favorable or improving conditions;
red=decreasing or poor conditions*

Size, abundance, and overall harvest levels of Copper River sockeye and Chinook salmon have decreased.	
1. Copper River sockeye and Chinook salmon have decreased in size over recent decades (Fig. 1).	↓
2. Average total returns and total harvests of Copper River sockeye and Chinook salmon have declined in the most recent 10-year period relative to the preceding 10-year period (Table 1).	↓
3. The overall decline in total salmon harvest most readily can be seen in patterns of the commercial fishery, as it accounted for over 75 percent of the sockeye salmon harvest and 65 percent of the Chinook salmon harvest during the 20-year period 2004-2023.	↓
4. But declining trends in harvest also are apparent in State and Federal subsistence fisheries in the Glennallen Subdistrict, both in terms of total salmon harvested per permit and catch per unit effort.	↓
5. Declines in Upper Copper River salmon harvests in several Upper Copper River communities have been documented by household surveys (Table 3).	↓
6. Long-term declines in the abundance of Upper Copper River salmon are documented by oral testimony provided during public meetings and in ethnographic interviews conducted during community harvest surveys.	↓
7. Declines in Upper Copper River salmon harvest and subsistence users' accounts of long-term salmon declines are consistent with long-term data from aerial surveys of Upper Copper River spawning grounds conducted annually by ADF&G (Table 4).	↓
Management of the Copper River District commercial fishery has resulted in a persistent pattern of disproportionate early-season harvest (statistical weeks 20-22) since at least 2003 (the earliest year examined for purposes of this assessment), placing greater relative harvest pressure on early-run stocks than on stocks with later run timing, with the degree of disproportionality increasing over time.	
8. Trend in average number of commercial openers prior to Miles Lake sonar passage reaching 70 percent of the cumulative Copper River management objective for the date (cover letter).	↑
9. On average over the 22-year period 2003-2024, the proportion (percent of season total) of the commercial harvest that occurred during statistical weeks 20-22 was 32.9 percent, whereas the proportion of sonar passage that occurred during the same period was 16.5 percent, with an average imbalance (or degree of disproportionality, calculated as sonar passage percent minus commercial harvest percent) of - 16.4 percent (Table 5, Fig. 2; also see figures in Attachment D and tables in Attachment E).	↑
10. During this same 22-year period, the early portion of the run (statistical weeks 20-22) was the only portion to exhibit a persistent pattern of disproportionately high commercial harvest (i.e., harvest exceeding sonar passage based on percents of season totals) (Fig. 2).	↑
11. The degree of disproportionality has increased over time, based on a comparison of the most recent 10- and 5-year periods with the prior 10-year period (Table 5).	↑

<p>Early-season run timing has become progressively later during the past two decades, with a similar but lesser trend in timing of salmon passage at the Tanada Creek weir in the upper Copper River drainage. But early-season management of the commercial fishery has been slow to adapt to this trend, contributing to the increasing degree of disproportionate early-season harvest.</p>	
<p>12. The proportion of sonar passage occurring during statistical weeks 20-22 decreased from 19.5 percent during the 10-year period 2005-2014 to 5.7 percent during the most recent 5-year period in 2020-2024 (Table 5), in part due to late sonar installation. At the Tanada Creek weir in the upper drainage, the average proportion of weir passage occurring by July 1st decreased by a lesser degree, from 18.2 percent for years 2004-2013 to 13.6 percent for years 2014-2023 (Table 6).</p>	
<p>13. The 2023 season exemplifies the pattern of disproportionately high early-season commercial harvest coinciding with a late run (Fig. 3; also see annotated figures for 2023 in Attachment D). During that year, 7.3 percent of season-total sonar passage occurred during statistical weeks 20-22, whereas 44.9 percent of season-total commercial harvest occurred during that same period (tables in Attachment E).</p>	
<p>Finally, Proposal 51, which proposes a decision rule intended to mitigate the issue of disproportionate early-season harvest, also would have benefited both Chinook & sockeye salmon escapement in low-run years.</p>	
<p>14. Back-testing Proposal 51, which proposes a decision rule intended to mitigate the issue of disproportionate early-season harvest, indicates that it also would have benefited Chinook salmon escapement in years 2010, 2020, and 2021 when the lower-bound escapement goal was not met and in 2024 when the escapement goal may not have been met (Table 7; annotated figures for 2020 in Attachment D).</p>	
<p>15. Back-testing the Proposal 51 decision rule further indicates that it also would have benefited sockeye salmon escapement in low-run years 2018 and 2020 (Table 8; annotated figures for 2020 in Attachment D).</p>	

Assessment of the Issue

The issue that we seek to address in Proposal 51 (pp. 47-50 in the Proposal Book) is that recent management of the Copper River District commercial fishery has resulted in disproportionately high harvest (exploitation rates) of early-run Copper River salmon stocks. In the proposal that we submitted in April 2024, we indicated that this pattern of disproportionate early-season harvest occurred in five of six years during the period 2018-2023. Here we provide evidence that **this pattern has been persistent since at least 2003 and the degree of early-season disproportionality¹ has increased** in the most recent 10- and 5-year periods relative to the prior 10-year period. **Management that results in a recurring pattern of disproportionately high exploitation rates for early-run salmon stocks is inconsistent with two statewide fisheries management policies.** These are the **Policy for the Management of Mixed Stock Salmon Fisheries** (5 AAC 39.220), which specifies in part that "... conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority;" and the **Policy for the Management of Sustainable Salmon Fisheries** (5 AAC 39.222), which specifies in part that "... salmon escapement should be managed in a manner to maintain genetic and phenotypic characteristics of the stock by assuring appropriate geographic and temporal distribution of spawners" We also provide evidence that **this persistent pattern of disproportionate early-season harvest has contributed to the degree to which Copper River Chinook (king) salmon runs have failed to meet lower-bound escapement goals in at least three years since 2010, contrary to the Copper River King Salmon Management Plan** (5 AAC 24.361), which specifies in part that "The department shall manage the Copper River commercial, sport, personal use, and subsistence fisheries to achieve a sustainable escapement goal of 21,000 - 31,000 for king salmon."

Without action by the board to mitigate this issue, persistent disproportionate exploitation of stocks with early migratory timing has the potential to diminish the overall population diversity of Copper River sockeye and Chinook salmon, affecting fisheries sustainability and resilience in relation to changing environmental conditions (Hilborn et al. 2003, Schindler et al. 2010), and threatening financial and food security for those reliant on Copper River salmon.

Members of the board, we recognize that management of Copper River salmon fisheries is complex, yet in the context of the issue that we seek to address, **there are several signals that together warrant increasing concern for the status of Copper River salmon populations and fisheries. These signals add weight to our request that the board act to adopt Proposal 51 in alignment with the precautionary approach outlined in the Policy for the Management of Sustainable Salmon Fisheries** (5 AAC 39.222(c)(5)), which specifies in part that "... in the face of uncertainty, salmon stocks, fisheries ... shall be managed conservatively ... [following] ... a precautionary approach, involving the application of prudent foresight that takes into account the uncertainties in salmon fisheries and ... the biological, social, cultural, and economic risks, and the need to take action with incomplete knowledge"

Key signals for the board and all Copper River stakeholders to consider in relation to Proposal 51 and the increasing need for a precautionary approach to managing Copper River salmon fisheries:

- 1. Size, abundance, and overall harvest levels of Copper River sockeye and Chinook salmon have decreased.**

¹ With respect to the harvest of early-run Copper River salmon stocks, we define "disproportionate" as the degree to which commercial harvest exceeds sonar passage during statistical weeks 20-22 (the last three weeks of May, generally), with harvest and passage totals compared on the basis of percent of season totals for each variable.

- a. **Copper River sockeye and Chinook salmon have decreased in size** over recent decades (Fig. 1), consistent with patterns documented for several other Pacific salmon populations (Lewis et al. 2015, Oke et al. 2020), and with implications for salmon productivity and the value of harvested fish for those dependent on Copper River salmon for subsistence or financial purposes.

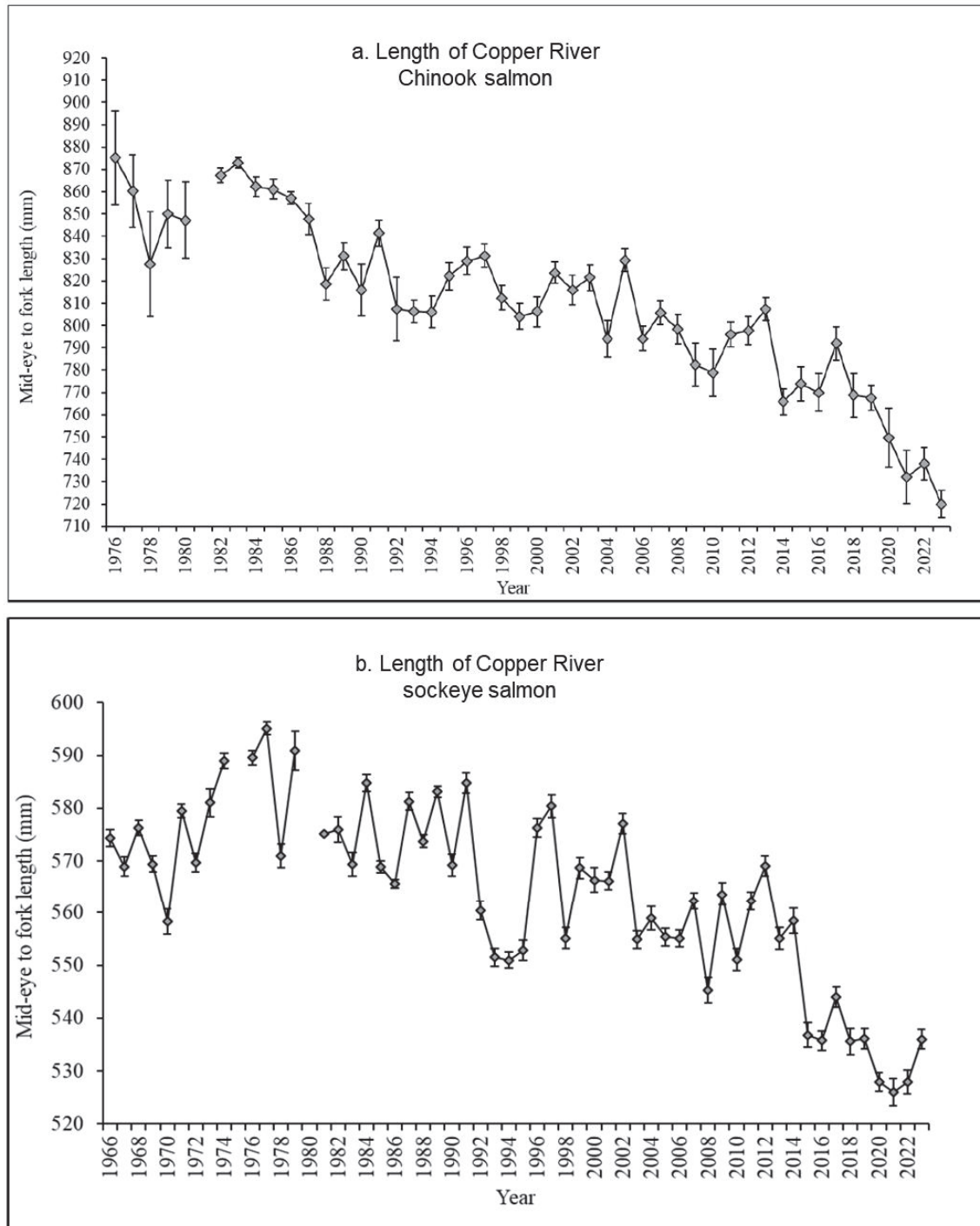


Figure 1. Length at age (1.3) for Copper River drift gillnet (a) Chinook salmon, 1976-2023, and (b) sockeye salmon, 1966-2023 (from Botz et al. 2024).

- b. **Average total returns and total harvests of Copper River sockeye and Chinook salmon have declined** in the most recent 10-year period relative to the preceding 10-year period (Table 1).

Table 1. Time trends in average estimated total return (run size) and total harvest of Copper River sockeye and Chinook salmon (derived from ADF&G and NPS data, Copper River District and Upper Copper River District combined).

Statistic by time period	Estimated total return		Total harvest	
	Sockeye salmon	Chinook salmon	Sockeye salmon	Chinook salmon
10-yr avg., 2004-2013	2,361,285	60,571	1,541,679	29,863
10-yr avg., 2014-2023	1,870,993	47,717	1,131,141	19,497
5-yr avg., 2019-2023	1,538,056	47,823	862,725	18,546
Pct. change, 2019-2023 v. 2004-2013	-34.9	-21.0	-44.0	-37.9

- c. **The overall decline in total salmon harvest largely is attributable to patterns in the commercial fishery**, as it accounted for over 75 percent of the sockeye salmon harvest and 65 percent of the Chinook salmon harvest during the 20-year period 2004-2023². **But declining trends in harvest also are apparent in State and Federal subsistence fisheries in the Glennallen Subdistrict**, both in terms of total salmon harvested per permit and catch per unit effort (CPUE, total salmon harvested per day fished, Table 2; map and additional tables, Attachment C). Declines in CPUE generally have increased with greater distance upriver and have been greatest in the Gakona-Slana reach – the uppermost reach where State and Federal subsistence harvesters are most reliant on Upper Copper River sockeye and Chinook salmon stocks that tend to be among the earliest stocks to enter the river (Merritt and Roberson 1986, Wade et al. 2009, Templin et al. 2011, Gilk-Baumer et al. 2017, Barclay 2024) and thus may be at greatest risk from a persistent pattern of disproportionate early-season harvest by the commercial fishery.

² Based on ADF&G data, the Copper River District commercial fishery accounted for 76.6 percent of the total Copper River sockeye salmon harvest during the 20-year period 2004-2023, and 81.4 percent of the total sockeye salmon harvest for the 18-year period excluding low-run years of 2018 and 2020 when the commercial fishery was greatly restricted. Corresponding figures for commercial harvest of Copper River Chinook salmon are 67.8 percent of the total harvest for the 20-year period 2004-2023 and 70.2 percent for the 18-year period excluding low-run years of 2018 and 2020.

Table 2. Time trends in average annual salmon harvest per permit and per day fished (catch per unit effort) by State and Federal subsistence users in three reaches of the Glennallen Subdistrict¹, and percent change between the 2004-2013 period and the recent 2019-2023 period.

Statistic by time period	Harvest per permit (total salmon)						Harvest (total salmon) per day fished (catch per unit effort)					
	State fishery			Federal fishery			State fishery			Federal fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg., 2004-2013	64.9	78.8	73.5	102.2	111.6	80.5	23.1	18.2	13.6	25.5	17.6	22.5
10-yr avg., 2014-2023	42.5	63.4	75.0	101.1	98.1	64.5	23.1	18.3	12.6	23.4	15.7	19.4
5-yr avg., 2019-2023	42.8	47.7	58.9	103.5	91.0	45.9	25.6	17.2	12.8	24.4	13.8	14.2
Pct. change, 2019-2023 v. 2004-2013	-34.1	-39.4	-19.8	1.3	-18.4	-43.0	10.8	-5.5	-5.9	-4.3	-21.6	-36.9

¹Reaches: Bridge-Tonsina (B-T), Tonsina-Gakona (B-G), and Gakona-Slana (G-S); see map, Fig. F1.

- d. **Declines in Upper Copper River salmon harvests in several Upper Copper River communities have been documented by household surveys** conducted by the Alaska Department of Fish and Game Division of Subsistence in cooperation with Wrangell-St. Elias and the Ahtna Intertribal Resource Commission. For subsistence users in the communities of Chistochina, Mentasta Lake, and Slana and along the Nabesna Road salmon harvests have declined both in terms of pounds per person and as a percentage of the total harvest of wild resources (Table 3).

Table 3. Changes in subsistence salmon harvests in Upper Copper River communities between 2009/2010 and 2022/2023¹.

Community	Survey year	Total harvest (all resources) per capita (lbs.)	Salmon harvest per capita (lbs.)	Salmon as pct. of total per capita harvest
Chistochina	2009	198.5	131.0	66%
	2022	151.9	44.6	29%
	Pct. change	-23.5	-66.0	-56.1
Mentasta Lake	2010	168.7	61.2	36%
	2022	68.5	19.3	28%
	Pct. change	-59.4	-68.5	-22.2
Mentasta Pass	2010	200.7	38.5	19%
	2022	181.4	46.3	26%
	Pct. change	-9.6	20.3	36.8
Slana - Nabesna Road	2010	240.4	132.9	55%
	2023	120.0	31.8	27%
	Pct. change	-50.1	-76.1	-50.9

¹Sources: Kukkonen and Zimpelman 2012; La Vine et al. 2013; ADF&G Division of Subsistence, 2023-2024 household surveys

- e. **Long-term declines in the abundance of Upper Copper River salmon are documented by oral testimony provided during public meetings and in ethnographic interviews conducted during community harvest surveys.** During the October 2024 meeting of the Wrangell-St. Elias Subsistence Resource Commission, a former Mentasta resident spoke about salmon in the Mentasta area:

“That first run that goes all the way up, it goes all the way up the Copper River, it hits the Slana River, goes all the way up to behind Mentasta, it's Bone Creek and then goes to Bone Lake, and that's king salmon spawning. That's a long ways to go. And we used to be able to see king salmon in that area. We're not really seeing that anymore. And then also the same in regards to sockeye salmon. They go all the way up Slana River, hit Mentasta Lake, go up Fish Creek and spawn there. **As a kid growing up, we could see when the salmon showed up in June, that creek bed would be just filled red with salmon. And now, we hardly see salmon spawning there.**”

A Chistochina resident made a similar observation in an ethnographic interview conducted during recent community harvest surveys:

"So they're going to have to allow days of no fishing below. They're going to have to let that resource get to where it needs to go. To spawning grounds. To the people up river, you know? We're the last ones to get a fish. Everybody fishes all the way from the mouth on up. And with these boats and everything, they're actually going down and targeting all the way from the mouth, you know? It's a—you know, we're Headwaters people. Our subsistence style of living is—like I said when you asked that question, I said drastically some years, the numbers are so low. **We used to go to all these spawning creeks. Like right here, we have Sinona Creek, which is about a quarter mile, there used to be just red with king salmons. Now you're lucky if you go down there and see one or two swimming up it.** Everything's getting hit hard."

- f. **Declines in Upper Copper River salmon harvest and subsistence users' accounts of long-term salmon declines are consistent with long-term data from aerial surveys of Upper Copper River spawning grounds** conducted annually by ADF&G (Table 4). Although these data are notorious for their questionable quality (e.g., highly variable among observers, affected by many environmental factors and survey conditions), the consistent pattern of recent declines raises questions about trends in spawning success and the current method for estimating spawning escapement and determining achievement of escapement goals.

Table 4. Average aerial survey indices¹ of sockeye salmon escapement to the Upper Copper River drainage, 2001-2023. Data are average ratio values, derived by dividing annual aerial survey indices (estimated numbers of spawners) by "projected indices" (calculated using 1983-1992 averages), then calculating average indices for specified time periods. Source data are from Botz et al. 2014, Appendix A14, and Botz et al. 2024, Appendix A11.

Statistic by time period	Upper Copper River salmon spawning locations									
	Mentasta Lake	Fish Creek–Mentasta	Bad Crossing 1 & 2	Suslota Lake	Tanada Lake	Dickey Lake	Keg Creek	Swede Lake	Mahlo Creek	Mendeltna Creek
Overall avg., 2001-2023	2.01	0.94	0.63	0.71	0.23	0.54	0.05	0.61	1.68	0.27
10-yr avg., 2004-2013	2.47	1.29	0.62	0.41	0.36	0.43	0.09	0.92	2.37	0.34
10-yr avg., 2014-2023	1.45	0.35	0.73	0.75	0.15	0.81	0.02	0.31	1.04	0.12
5-yr avg., 2019-2023	1.24	0.27	0.87	0.02	0.06	0.47	0.02	0.44	0.75	0.07
Pct. change, 2019-2023 v. 2004-2013	-49.8	-79.0	39.9	-95.0	-83.0	8.1	-75.4	-52.2	-68.5	-79.3

¹ Escapement numbers are based on peak aerial survey indices and weir counts from the majority of known spawning areas in the upper Copper River drainage. The indices are not intended to provide true estimates of escapement for these stocks but rather a comparable index, based on the best data available, across years. Missing counts are generally a result of bad weather, high water, or other factors that prevented surveys for a given year (excerpted from Botz et al. 2024, Appendix A11).

Table 4, continued.

Statistic by time period	Upper Copper River salmon spawning locations									
	St. Anne Creek	Tonsina Lake	Long Lake	Tana River	Salmon Creek (Bremner)	Fish Lake	Mud Creek – Summit Lake	Paxson Inlet – Mud Creek	Mud Creek & Lake	Paxson Lake outlet
Overall avg., 2001-2023	0.64	0.00	0.11	0.14	0.95	0.11	0.18	0.46	0.28	0.15
10-yr avg., 2004-2013	1.16	0.01	0.24	0.26	1.20	0.15	0.30	0.66	0.30	0.22
10-yr avg., 2014-2023	0.15	0.00	0.00	0.03	0.61	0.00	0.02	0.17	0.10	0.09
5-yr avg., 2019-2023	0.06	0.00	0.00	0.01	0.74	0.00	0.01	0.09	0.02	0.10
Pct. change, 2019-2023 v. 2004-2013	-94.5	-44.8	-100.0	-95.4	-38.4	-98.7	-95.4	-86.9	-93.4	-55.4

2. Management of the Copper River District commercial fishery has resulted in *a persistent pattern of disproportionate early-season harvest (statistical weeks 20-22) since at least 2003 (the earliest year examined for purposes of this assessment), placing greater relative harvest pressure on early-run stocks than on stocks with later run timing, with the degree of disproportionality increasing over time.*

- a. On average over the 22-year period 2003-2024, the proportion (percent of season total) of the commercial harvest that occurred during statistical weeks 20-22 was 32.9 percent.

whereas the proportion of sonar passage that occurred during the same period was 16.5 percent, with an average imbalance (or *degree of disproportionality*, calculated as sonar passage percent minus commercial harvest percent) of -16.4 percent (Table 5, Fig. 2; also see figures in Attachment D and tables in Attachment E).

- b. During this same 22-year period, *the early portion of the run (statistical weeks 20-22) was the only portion to exhibit a persistent pattern of disproportionately high commercial harvest* (i.e., harvest exceeding sonar passage based on percents of season totals) (Fig. 2).
- c. *The degree of disproportionality has increased over time*, based on a comparison of the most recent 10- and 5-year periods with the prior 10-year period (Table 5).

Table 5. Time trends for average **early-season sonar-harvest balance**, calculated as observed daily sonar passage minus total commercial harvest for statistical weeks 20-22, based on percent of season totals. For comparative purposes, balances also are calculated with harvest data lagged by 5 days to account for the approximate amount of time required for salmon to travel from the commercial fishery upstream to the Miles Lake sonar. (Derived from ADF&G data published in annual Prince William Sound area finfish management reports. See figures in Attachment D and tables in Attachment E.)

Statistic by time period	Percent of season totals, statistical weeks 20-22			Percent of season totals, statistical weeks 20-22		
	Observed sonar passage	Com- mercial harvest	Sonar- harvest balance	Observed sonar passage	With 5-day harvest lag	
					Com- mercial harvest	Sonar- harvest balance
Overall avg., 2003-2024	16.5	32.9	-16.4	16.5	25.7	-9.2
10-yr avg., 2005-2014	19.5	35.9	-16.5	19.5	28.1	-8.6
10-yr avg., 2015-2024	12.9	31.9	-19.0	12.9	24.9	-12.0
5-yr avg., 2020-2024	5.7	27.3	-21.6	5.7	20.9	-15.2
Pct. change, 2020-2024 v. 2005-2014	-70.8	-24.0	-30.9	-70.8	-25.7	-76.8

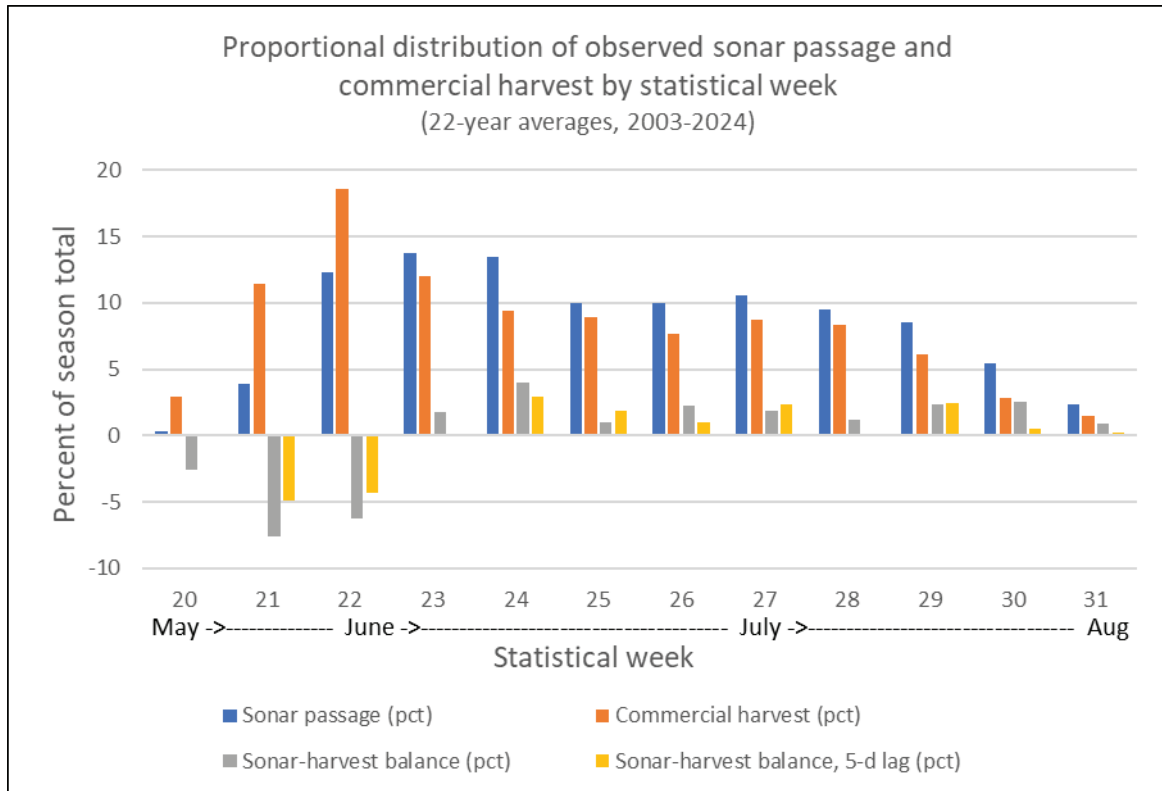


Figure 2. Average proportional distribution (percent of season totals) of observed Miles Lake sonar passage and Copper River District commercial harvest (sockeye and Chinook salmon) by statistical week for the 22-year period 2003-2024 (derived from ADF&G data). Sonar-harvest balances are calculated as observed sonar passage minus commercial harvest (percents of season totals) by statistical week. For comparative purposes, balances also are calculated with harvest data lagged by 5 days to account for the approximate amount of time required for salmon to travel from the commercial fishery upstream to the Miles Lake sonar. (Derived from ADF&G data published in annual Prince William Sound area finfish management reports. See figures in Attachment D and tables in Attachment E.)

3. **Early-season run timing has become progressively later during the past two decades**, with a similar but lesser trend in timing of salmon passage at the Tanada Creek weir in the upper Copper River drainage. **But early-season management of the commercial fishery has been slow to adapt to this trend, contributing to the increasing degree of disproportionate early-season harvest.** These two trends (later runs and slow management adaptation) have increased the likelihood that lower-bound escapement goals will not be met in years when “late runs” turn out to be “low runs,” as reflected by Copper River Chinook and sockeye salmon in recent years.
 - a. The proportion of sonar passage occurring during statistical weeks 20-22 decreased from 19.5 percent during the 10-year period 2005-2014 to 5.7 percent during the most recent 5-year period in 2020-2024 (Table 5), *in part* due to late sonar installation. At the Tanada Creek weir in the upper drainage, the average proportion of weir passage occurring by July 1st decreased by a lesser degree, from 18.2 percent for years 2004-2013 to 13.6 percent for years 2014-2023 (Table 6). In contrast, the proportion of commercial harvest occurring during statistical weeks 20-22 decreased by a lesser degree, from 35.9 percent during the period 2005-2014 to 27.3 percent during the period 2020-2024 (Table 5).

Table 6. Average cumulative salmon passage by date and average total passage, Tanada Creek weir (NPS data).

Statistic by time period	Cumulative percents of season- total weir passage by date				Total weir passage
	1-Jul	15-Jul	1-Aug	15-Aug	
Avg., 2004- 2013 ¹	18.2	40.5	70.8	89.1	22,013.0
Avg., 2014- 2023 ²	13.6	27.3	52.6	72.2	18,900.0
Pct. change, 2014-2023 v. 2004-2013	-25.3	-32.6	-25.7	-19.0	-14.1

¹ 6 years of data: 2004, 2006, 2007, 2009, 2011, 2013

² 6 years of data: 2014, 2016-2018, 2022-2023

- b. The 2023 season exemplifies the pattern of disproportionately high early-season commercial harvest coinciding with a late run (Fig. 3). During that year, **7.3 percent of season-total sonar passage occurred during statistical weeks 20-22, whereas 44.9 percent of season-total commercial harvest occurred during that same period** (see figures for 2023 in Attachment D and tables in Attachment E). Preliminary genetic stock composition estimates indicate that sockeye salmon harvested during statistical weeks 20-22 (six open-fishing periods, 15-May through 5-June; Botz et al. 2024) primarily were from Klutina Lake (approx. 2/3) and Upper Copper River (approx. 1/3) stock reporting groups (ADF&G, unpublished preliminary data; Fig. 4, Fig. 5).

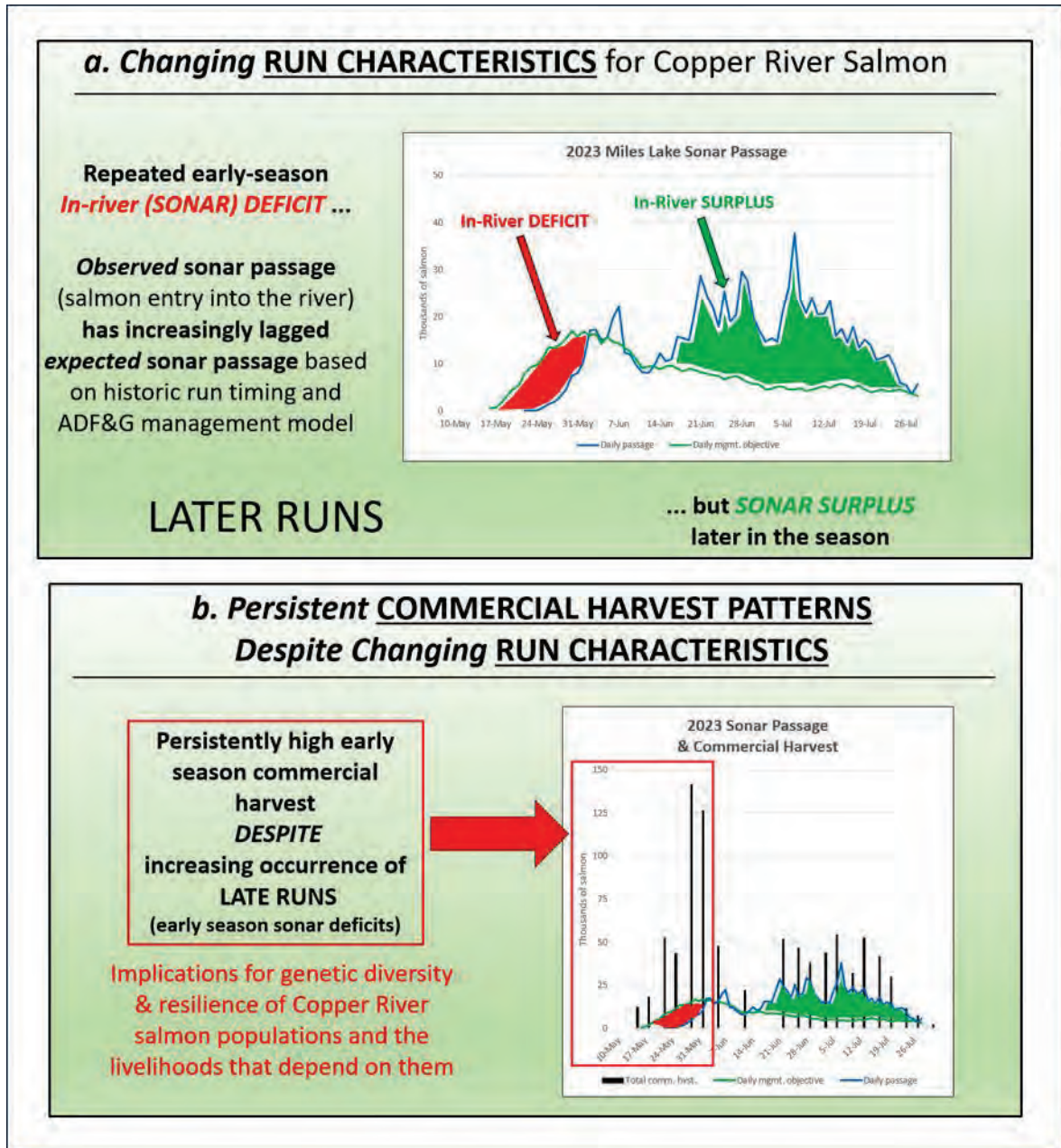


Figure 3. Graphics illustrating the late run in 2023, with (a) an early-season deficit in sonar passage (observed passage less than management objectives for passage) and in-river salmon, and (b) disproportionately high commercial harvest despite late run entry. See additional figures in Attachment D and tables in Attachment E.

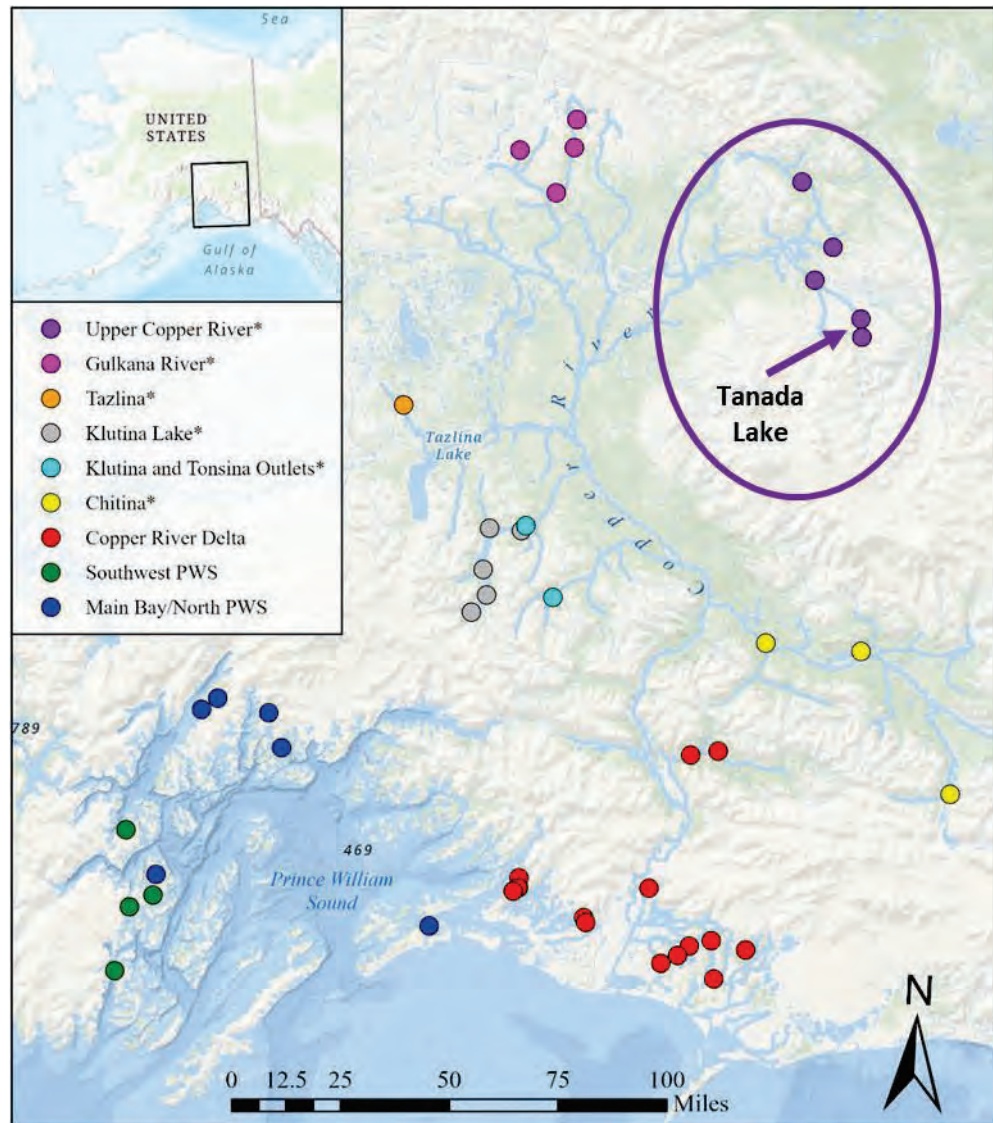


Figure 4. Map of the Copper River and Prince William Sound area showing the location of sockeye salmon baseline populations and their reporting group affiliations for genetic mixed stock analysis of Copper River sockeye commercial, personal use, and subsistence fishery harvests. All nine reporting groups are used by ADF&G for analysis of Copper River District commercial harvests, whereas six reporting groups (indicated by asterisks) are used for analysis of Chitina Subdistrict personal use harvests and Glennallen Subdistrict subsistence harvests. (Figure courtesy of ADF&G, with modification by NPS to call out the Upper Copper River reporting group.)

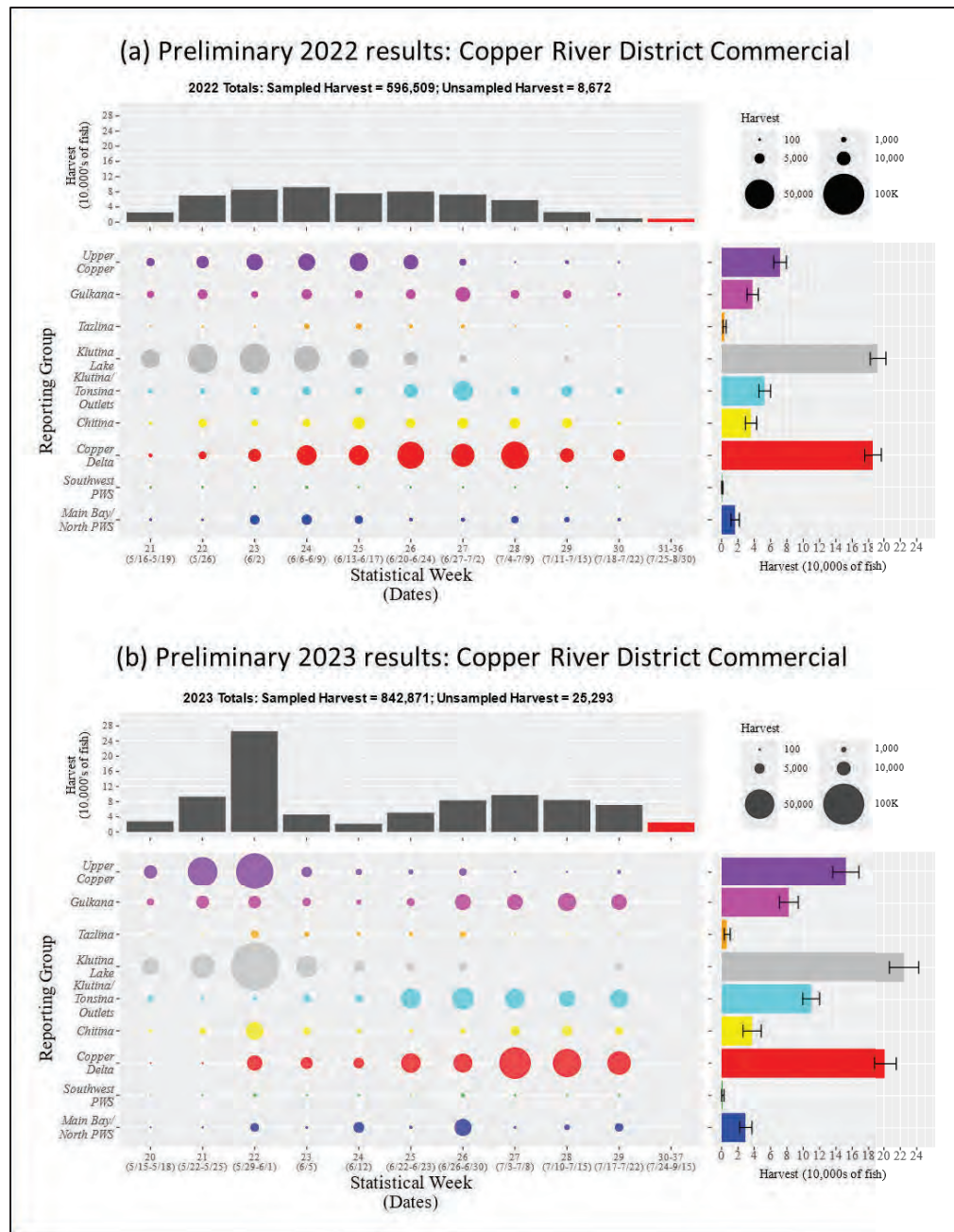


Figure 5. Preliminary Copper River District commercial sockeye salmon harvest estimates by reporting group and statistical week for 2022 (a) and 2023 (b), as presented by ADF&G during an April 2024 public meeting. Key: The bubble plot shows stock-specific harvest estimates (means) of sockeye salmon for all statistical weeks (x-axis) and 9 reporting groups (y-axis). Circle sizes represent the stock-specific harvest for a statistical week (see legend, top right of figures), with reporting groups denoted by color. The top bar in each plot shows the total harvest during each week, with unsampled weeks in red. The right bar plot shows the stock-specific harvest and 90% credibility intervals for the entire year across all sampled weeks.

- c. Finally, **back-testing Proposal 51, which proposes a decision rule intended to mitigate the issue of disproportionate early-season harvest, demonstrates that it would have benefited Chinook salmon escapement in years 2010, 2020, and 2021 when the lower-bound escapement goal was not met and in 2024 when the escapement goal may not have been met (Table 7; annotated figures for 2020 in Attachment D).**

Table 7. Potential benefits of the Proposal 51 decision rule for additional Chinook salmon escapement (**column in bold font**) in low-run years 2010, 2020, 2021, and 2024.

Year	Lower-bound sustainable escapement goal	Escapement estimate	Date of 70-pct threshold ¹	No. of open commercial fishing periods prior to 70-pct threshold	Commercial harvest <i>after period 2 and before 70-pct threshold</i> ²
2010	24,000	16,764	3-Jun	5	4,379
2020	24,000	21,587	15-Jun	4	2,422
2021	24,000	18,431	6-Jun	3	2,132
2024	21,000	<i>Pending</i>	9-Jun	5	4,126

¹ Defined as the first date of the season when cumulative sonar passage is at least 70 percent of the cumulative management objective.

² Chinook harvest that would have been foregone had proposed regulation been in place, resulting in significant additional contributions to escapement.

- d. **Back-testing the Proposal 51 decision rule indicates that it also would have benefited sockeye salmon escapement in low-run years 2018 and 2020 (Table 8; annotated figures for 2020 in Attachment D).**

Table 8. Potential benefits of the Proposal 51 decision rule for additional sockeye salmon escapement (**column in bold font**) in low-run years 2018 and 2020.

Year	Lower-bound sustainable escapement goal	Escapement estimate	Date of 70-pct threshold	No. of open commercial fishing periods prior to 70-pct threshold	Commercial harvest <i>after period 2 and before 70-pct threshold</i> ²
2018	360,000	478,701	3-Jun	3	21,087
2020	360,000	362,445	15-Jun	4	67,635

¹ Sockeye harvest that would have been foregone had proposed regulation been in place, resulting in significant additional contributions to escapement.

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Attachment C – Map of the Glennallen Subdistrict, and tables summarizing and comparing measures of participation and harvest (total salmon) in State and Federal subsistence fisheries in three reaches of the Glennallen Subdistrict for years 2004-2023.

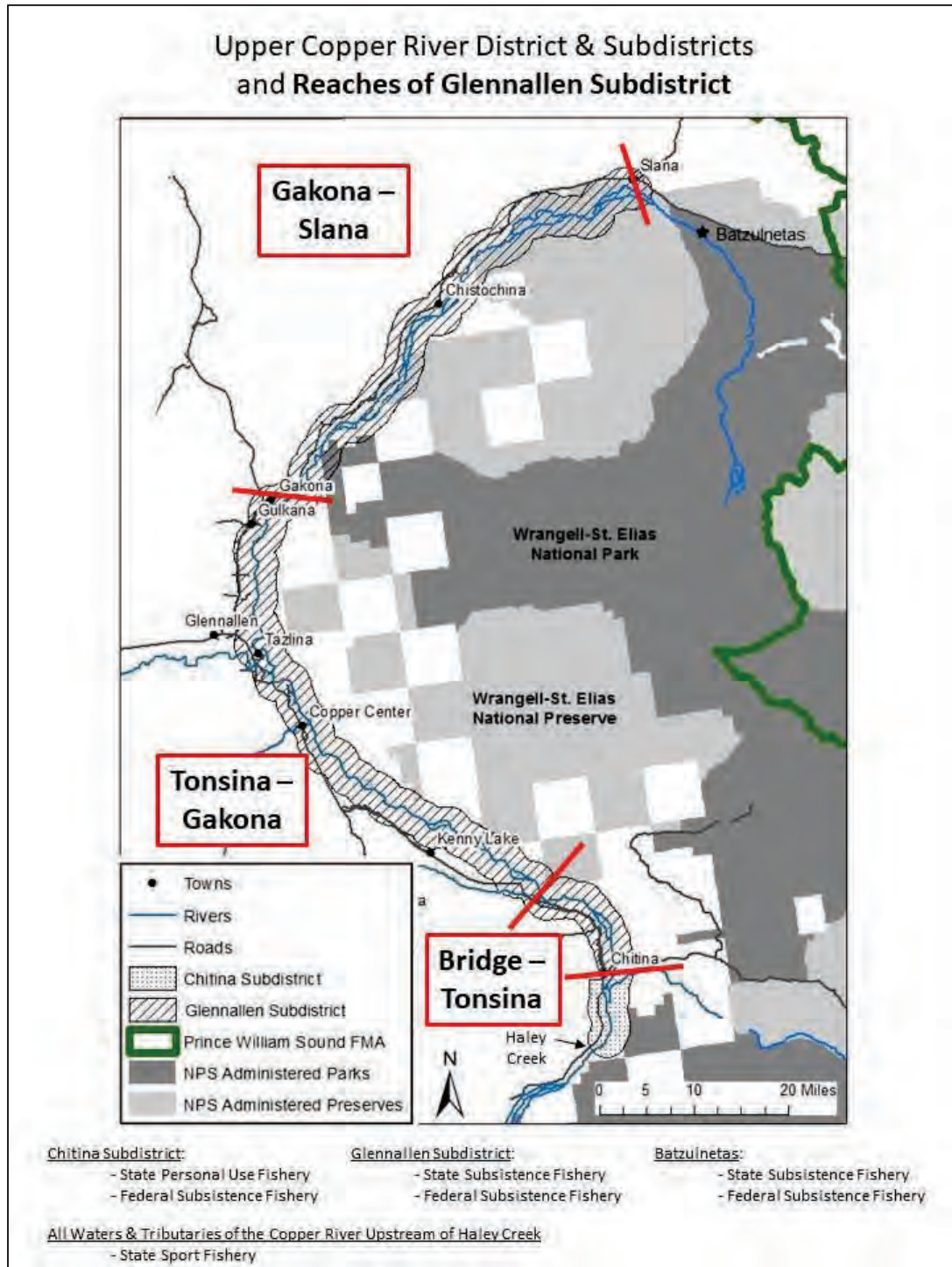


Fig. C1. Map showing three reaches (Bridge-Tonsina, Tonsina-Gakona, and Gakona-Slana, indicated by red demarcations) used for tracking patterns of subsistence harvest in the Glennallen Subdistrict.

Subsistence Participation & Harvest, Bridge-Tonsina

Table C1a. Measures of participation and harvest (total salmon) in the Upper Copper River subsistence salmon fisheries in the Bridge-Tonsina reach of the Glennallen Subdistrict (GSD), years 2002-2023 (ADF&G and NPS data).

Year	Early season sonar-harvest balance ¹	Participation in State subsistence fishery					Participation in Federal subsistence fishery					Harvest (total salmon) in State subsistence fishery					Harvest (total salmon) in Federal subsistence fishery				
		GSD ³ return (total salmon)	Permits fished	Avg. days fished per permit	Total permit-days fished	Total permit-days fished	Permits fished	Avg. days fished per permit	Total permit-days fished	Avg. harvest per 100k inriver	Harvest per permit	Avg. harvest per 100k inriver	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k inriver	Harvest per permit	Avg. harvest per 100k inriver	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k inriver	Harvest per permit	Avg. harvest per 100k inriver	Harvest per day fished (catch per unit effort)
2004	3.2	684,103	575,576	419	2.9	1,227	26	5.0	129	76.2	11.1	13.2	26	99.6	14.6	17.3	20	99.6	14.6	17.3	20
2005	-12.7	855,125	732,662	450	3.0	1,346	31	2.7	85	89.7	10.5	12.2	30	145.3	17.0	19.8	53	145.3	17.0	19.8	53
2006	-3.3	959,706	834,896	489	3.1	1,521	20	4.5	89	74.7	7.8	8.9	24	187.8	19.6	22.5	42	187.8	19.6	22.5	42
2007	-16.1	919,601	793,447	583	3.1	1,795	43	4.4	187	73.9	8.0	9.3	24	100.2	10.9	12.6	23	100.2	10.9	12.6	23
2008	-25.4	718,344	636,026	594	2.8	1,654	48	3.3	158	44.5	6.2	7.0	16	69.1	9.6	10.9	21	69.1	9.6	10.9	21
2009	-24.6	709,748	618,831	521	3.0	1,588	46	3.8	177	51.8	7.3	8.4	17	61.4	8.7	9.9	16	61.4	8.7	9.9	16
2010	-20.3	923,811	783,000	665	2.9	1,932	48	4.2	201	61.0	6.6	7.8	21	66.9	7.2	8.5	16	66.9	7.2	8.5	16
2011	-7.8	914,231	784,246	679	2.8	1,933	43	5.0	217	54.1	5.9	6.9	19	95.7	10.5	12.2	19	95.7	10.5	12.2	19
2012	-14.0	1,294,400	1,166,342	741	2.4	1,752	44	4.2	186	59.1	4.6	5.1	25	101.3	7.8	8.7	24	101.3	7.8	8.7	24
2013	-33.1	1,267,060	1,084,145	718	2.2	1,592	34	4.5	154	64.3	5.1	5.9	29	94.9	7.5	8.8	21	94.9	7.5	8.8	21
2014	-7.7	1,218,418	1,059,539	853	2.3	1,941	39	5.4	212	54.6	4.5	5.2	24	92.6	7.6	8.7	17	92.6	7.6	8.7	17
2015	-8.3	1,346,100	1,120,675	868	2.1	1,785	35	3.8	132	55.5	4.1	5.0	27	132.2	9.8	11.8	35	132.2	9.8	11.8	35
2016	-3.2	801,593	651,290	907	2.1	1,881	19	4.5	86	41.5	5.2	6.4	20	90.4	11.3	13.9	20	90.4	11.3	13.9	20
2017	-8.1	723,426	589,132	893	2.0	1,791	20	4.1	81	30.1	4.2	5.1	15	65.1	9.0	11.0	16	65.1	9.0	11.0	16
2018	-57.3	701,577	621,035	832	1.7	1,437	23	4.7	109	29.4	4.2	4.7	17	113.3	16.1	18.2	24	113.3	16.1	18.2	24
2019	-4.9	1,039,354	863,941	921	1.8	1,669	33	3.4	113	41.7	4.0	4.8	23	78.9	7.6	9.1	23	78.9	7.6	9.1	23
2020	-31.7	530,313	448,885	771	1.7	1,287	32	4.2	136	33.4	6.3	7.4	20	72.0	13.6	16.0	17	72.0	13.6	16.0	17
2021	-9.4	751,262	602,546	843	1.6	1,337	22	3.9	86	36.5	4.9	6.1	23	101.5	13.5	16.9	26	101.5	13.5	16.9	26
2022	-15.4	785,509	627,565	634	1.6	1,011	26	5.5	144	52.6	6.7	8.4	33	116.3	14.8	18.5	21	116.3	14.8	18.5	21
2023	-37.7	991,740	817,208	722	1.7	1,241	20	4.3	85	49.8	5.0	6.1	29	148.8	15.0	18.2	35	148.8	15.0	18.2	35
10-yr avg. 2004-2013	-15.4	924,612.9	800,917.1	585.9	2.8	1,634.0	38.3	4.2	158.2	64.9	7.3	8.5	23.1	102.2	11.3	13.1	25.5	102.2	11.3	13.1	25.5
10-yr avg. 2014-2023	-18.4	888,929.2	740,181.6	824.4	1.9	1,537.7	26.9	4.4	118.4	42.5	4.9	5.9	23.1	101.1	11.8	14.2	23.4	101.1	11.8	14.2	23.4
5-yr avg. 2019-2023	-19.8	819,635.6	672,029.0	778.2	1.7	1,308.6	26.6	4.3	112.8	42.8	5.4	6.6	25.6	103.5	12.9	15.8	24.4	103.5	12.9	15.8	24.4
10-yr CV ⁴ 2004-2013	71.2	23.0	24.0	19.4	10.7	14.2	25.8	17.1	28.3	21.0	29.4	30.7	20.7	37.6	37.8	38.2	47.7	37.6	37.8	38.2	47.7
10-yr CV 2014-2023	97.5	28.5	29.5	11.0	12.7	20.6	26.9	15.6	34.2	23.8	19.1	20.7	23.8	26.5	27.0	27.0	29.6	26.5	27.0	27.0	29.6
5-yr CV 2019-2023	71.8	25.0	22.8	19.1	15.0	8.9	21.4	14.4	22.9	19.4	20.5	21.0	20.6	37.0	36.6	36.5	36.7	37.0	36.6	36.5	36.7

¹ Sum of sonar passage percent minus commercial harvest percent for statistical weeks 20-22, with passage and harvest percent calculated on basis of season totals.

² Sonar passage

³ Sonar passage - Chitina SD harvest, (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

⁴ Coefficient of variation (CV) calculated as 100*(StdDev/mean)

Subsistence Participation & Harvest, Bridge-Tonsina

Table C1b. Measures of participation and harvest (total salmon) in the Upper Copper River subsistence salmon fisheries in the Bridge-Tonsina reach of the Glennallen Subdistrict (GSD), years 2002-2023 (ADF&G and NPS data). Cells for all annual data and 10-yr and 5-yr averages are colored from green for the highest values to red for the lowest values in the set of cells contained within the same **thick outside borders**. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green indicating low CV values.

Year	Early season sonar-harvest balance ¹	Participation in State subsistence fishery					Participation in Federal subsistence fishery					Harvest (total salmon) in State subsistence fishery				Harvest (total salmon) in Federal subsistence fishery				
		GSD ² return (total salmon)	Permits fished	Avg. days fished per permit	Total permit-days fished	Permits	Avg. days fished per permit	Total permit-days fished	Avg. harvest per permit	per 100k <i>Inriver</i>	Avg. harvest per 100k GSD return	Harvest per day fished (catch per unit effort)	Avg. harvest per permit	per 100k <i>Inriver</i>	Avg. harvest per 100k GSD return	Harvest per day fished (catch per unit effort)	Avg. harvest per permit	per 100k <i>Inriver</i>	Avg. harvest per 100k GSD return	Harvest per day fished (catch per unit effort)
2004	3.2	684,103	419	2.9	1,227	26	5.0	129	76.2	11.1	13.2	26	99.6	14.6	17.3	26	99.6	14.6	17.3	26
2005	-12.7	855,125	450	3.0	1,346	31	2.7	85	89.7	10.5	12.2	30	145.3	17.0	19.8	30	145.3	17.0	19.8	30
2006	-3.3	959,706	489	3.1	1,521	20	4.5	89	74.7	7.8	8.9	24	187.8	19.6	22.5	24	187.8	19.6	22.5	24
2007	-16.1	919,601	583	3.1	1,795	43	4.4	187	73.9	8.0	9.3	24	100.2	10.9	12.6	24	100.2	10.9	12.6	24
2008	-25.4	718,344	594	2.8	1,654	48	3.3	158	44.5	6.2	7.0	16	69.1	9.6	10.9	16	69.1	9.6	10.9	16
2009	-24.6	709,748	521	3.0	1,588	46	3.8	177	51.8	7.3	8.4	17	61.4	8.7	9.9	17	61.4	8.7	9.9	17
2010	-20.3	923,811	665	2.9	1,932	48	4.2	201	61.0	6.6	7.8	21	66.9	7.2	8.5	21	66.9	7.2	8.5	21
2011	-7.8	914,231	679	2.8	1,933	43	5.0	217	54.1	5.9	6.9	19	95.7	10.5	12.2	19	95.7	10.5	12.2	19
2012	-14.0	1,294,400	741	2.4	1,752	44	4.2	186	59.1	4.6	5.1	25	101.3	7.8	8.7	25	101.3	7.8	8.7	25
2013	-33.1	1,287,060	718	2.2	1,592	34	4.5	154	64.3	5.1	5.9	29	94.9	7.5	8.8	29	94.9	7.5	8.8	29
2014	-7.7	1,218,418	853	2.3	1,941	39	5.4	212	54.6	4.5	5.2	24	92.6	7.6	8.7	24	92.6	7.6	8.7	24
2015	-8.3	1,346,100	868	2.1	1,785	35	3.8	132	55.5	4.1	5.0	27	132.2	9.8	11.8	27	132.2	9.8	11.8	27
2016	-3.2	801,593	907	2.1	1,881	19	4.5	86	41.5	5.2	6.4	20	90.4	11.3	13.9	20	90.4	11.3	13.9	20
2017	-8.1	723,426	893	2.0	1,791	20	4.1	81	30.1	4.2	5.1	15	65.1	9.0	11.0	15	65.1	9.0	11.0	15
2018	-57.3	701,577	832	1.7	1,437	23	4.7	109	29.4	4.0	4.7	17	113.3	16.1	18.2	17	113.3	16.1	18.2	17
2019	-4.9	1,039,354	921	1.8	1,669	33	3.4	113	41.7	4.0	4.8	23	78.9	7.6	9.1	23	78.9	7.6	9.1	23
2020	-31.7	530,313	771	1.7	1,287	32	4.2	136	33.4	6.3	7.4	20	72.0	13.6	16.0	20	72.0	13.6	16.0	20
2021	-9.4	751,262	843	1.6	1,337	22	3.9	86	36.5	4.9	6.1	23	101.5	13.5	16.9	23	101.5	13.5	16.9	23
2022	-15.4	785,509	634	1.6	1,011	26	5.5	144	52.6	6.7	8.4	33	116.3	14.8	18.5	33	116.3	14.8	18.5	33
2023	-37.7	991,740	722	1.7	1,241	20	4.3	85	49.8	5.0	6.1	29	148.8	15.0	18.2	29	148.8	15.0	18.2	29
10-yr avg. 2004-2013	-15.4	924,612.9	585.9	2.8	1,634.0	38.3	4.2	158.2	64.9	7.3	8.5	23.1	102.2	11.3	13.1	23.1	102.2	11.3	13.1	23.1
10-yr avg. 2014-2023	-18.4	888,929.2	824.4	1.9	1,537.7	26.9	4.4	118.4	42.5	4.9	5.9	23.1	101.1	11.8	14.2	23.1	101.1	11.8	14.2	23.1
5-yr avg. 2019-2023	-19.8	819,635.6	778.2	1.7	1,308.6	26.6	4.3	112.8	42.8	5.4	6.6	25.6	103.5	12.9	15.8	25.6	103.5	12.9	15.8	25.6
10-yr CV ⁴ 2004-2013	71.2	23.0	19.4	10.7	14.2	25.8	17.1	28.3	21.0	29.4	30.7	20.7	37.6	37.8	38.2	20.7	37.6	37.8	38.2	20.7
10-yr CV 2014-2023	97.5	28.5	11.0	12.7	20.6	26.9	15.6	34.2	23.8	19.1	20.7	23.8	26.5	27.0	27.0	23.8	26.5	27.0	27.0	23.8
5-yr CV 2019-2023	71.8	25.0	19.1	15.0	8.9	21.4	14.4	22.9	19.4	20.5	21.0	20.6	37.0	36.6	36.5	20.6	37.0	36.6	36.5	20.6

¹ Sum of sonar passage percent minus commercial harvest percent for statistical weeks 20-22, with passage and harvest percent calculated on basis of season totals.

² Sonar passage

³ Sonar passage - Chitina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

⁴ Coefficient of variation (CV) calculated as 100*(StdDev/mean)

Subsistence Participation & Harvest, Tonsina-Gakona

Table C2a. Measures of participation and harvest (total salmon) in the Upper Copper River subsistence salmon fisheries in the Tonsina-Gakona reach of the Glennallen Subdistrict (GSD), years 2002-2023 (ADF&G and NPS data).

Year	Early season sonar-harvest balance ¹	Participation in State subsistence fishery				Participation in Federal subsistence fishery				Harvest (total salmon) in State subsistence fishery				Harvest (total salmon) in Federal subsistence fishery			
		Permits fished	Avg. days fished per permit	Total permit-days fished	Total permit-days	Permits fished	Avg. days fished per permit	Total permit-days fished	Total permit-days	Avg. harvest per 100k inriver	Avg. harvest per permit	Avg. harvest per 100k GSD	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k inriver	Avg. harvest per permit	Avg. harvest per 100k GSD	Harvest per day fished (catch per unit effort)
2004	3.2	684,103	575,576	222	4.2	929	42	8.7	364	75.3	11.0	13.1	18	164.5	24.1	28.6	19
2005	-12.7	855,125	732,662	232	4.3	993	39	7.6	295	85.6	10.0	11.7	20	120.9	14.1	16.5	16
2006	-3.3	959,706	834,896	215	4.1	885	55	6.2	343	78.2	8.1	9.4	19	112.3	11.7	13.5	18
2007	-16.1	919,601	793,447	246	4.6	1,142	52	8.0	416	74.3	8.1	9.4	16	128.1	13.9	16.1	16
2008	-25.4	718,344	636,026	239	4.6	1,103	51	7.9	404	60.0	8.4	9.4	13	118.7	16.5	18.7	15
2009	-24.6	709,748	618,831	225	5.0	1,114	53	5.5	290	74.3	10.5	12.0	15	93.0	13.1	15.0	17
2010	-20.3	923,811	783,000	243	4.7	1,141	72	5.1	369	98.6	10.7	12.6	21	87.2	9.4	11.1	17
2011	-7.8	914,231	784,246	246	4.6	1,140	63	5.8	367	69.5	7.6	8.9	15	93.2	10.2	11.9	16
2012	-14.0	1,294,400	1,166,342	272	4.1	1,114	64	6.0	382	86.0	6.6	7.4	21	101.4	7.8	8.7	17
2013	-33.1	1,267,060	1,084,145	236	3.6	852	59	3.8	227	86.7	6.8	8.0	24	96.2	7.6	8.9	25
2014	-7.7	1,218,418	1,059,539	222	4.2	937	75	6.1	459	84.4	6.9	8.0	20	116.2	9.5	11.0	19
2015	-8.3	1,346,100	1,120,675	243	4.1	989	98	5.7	556	93.6	7.0	8.4	23	113.6	8.4	10.1	20
2016	-3.2	801,593	651,290	208	4.1	846	77	8.3	640	77.3	9.6	11.9	19	108.1	13.5	16.6	13
2017	-8.1	723,426	589,132	138	4.8	659	92	5.7	522	66.8	9.2	11.3	14	85.1	11.8	14.4	15
2018	-57.3	701,577	621,035	168	3.5	585	115	4.9	562	73.2	10.4	11.8	21	102.7	14.6	16.5	21
2019	-4.9	1,039,354	863,941	188	3.6	676	92	6.4	585	64.7	6.2	7.5	18	101.8	9.8	11.8	16
2020	-31.7	530,313	448,885	198	3.0	602	96	6.2	597	39.5	7.5	8.8	13	74.6	14.1	16.6	12
2021	-9.4	751,262	602,546	223	2.4	546	90	6.3	563	39.2	5.2	6.5	16	81.3	10.8	13.5	13
2022	-15.4	785,509	627,565	191	2.4	466	88	6.9	604	48.8	6.2	7.8	20	89.2	11.4	14.2	13
2023	-37.7	991,740	817,208	244	2.4	597	76	7.2	548	46.5	4.7	5.7	19	108.2	10.9	13.2	15
10-yr avg. 2004-2013	-15.4	924,612.9	800,917.1	237.6	4.4	1,041.2	55.0	6.5	345.6	78.8	8.8	10.2	18.2	111.6	12.9	14.9	17.6
10-yr avg. 2014-2023	-18.4	888,929.2	740,181.6	202.3	3.5	690.4	89.9	6.4	563.7	63.4	7.3	8.8	18.3	98.1	11.5	13.8	15.7
5-yr avg. 2019-2023	-19.8	819,635.6	672,029.0	208.8	2.8	577.4	88.4	6.6	579.4	47.7	6.0	7.3	17.2	91.0	11.4	13.9	13.8
10-yr CV ⁴ 2004-2013	71.2	23.0	24.0	6.7	9.0	11.1	18.2	23.5	16.9	13.7	18.5	19.7	18.8	20.8	38.0	39.1	16.1
10-yr CV 2014-2023	97.5	28.5	29.5	16.4	24.3	25.3	13.5	14.8	8.8	30.3	26.2	25.1	17.1	14.8	17.8	17.1	20.6
5-yr CV 2019-2023	71.8	25.0	22.8	11.5	18.5	13.4	8.5	6.6	4.0	21.8	17.9	16.6	16.1	15.3	14.1	12.8	11.9

¹ Sum of sonar passage percent minus commercial harvest percent for statistical weeks 20-22, with passage and harvest percent calculated on basis of season totals.

² Sonar passage

³ Sonar passage - Chitina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

⁴ Coefficient of variation (CV) calculated as 100*(StdDev/mean)

Subsistence Participation & Harvest, Tonsina-Gakona

Table C2b. Measures of **participation** and **harvest** (total salmon) in the Upper Copper River subsistence salmon fisheries in the **Tonsina-Gakona reach of the Glennallen Subdistrict (GSD)**, years 2002-2023 (ADF&G and NPS data). Cells for all annual data and 10-yr and 5-yr averages are colored from green for the highest values to red for the lowest values in the set of cells contained within the same **thick outside borders**. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green indicating low CV values.

Year	Early season sonar-harvest balance ¹	Participation in State subsistence fishery					Participation in Federal subsistence fishery					Harvest (total salmon) in State subsistence fishery					Harvest (total salmon) in Federal subsistence fishery				
		<i>Inriver</i> ² return (salmon)	GSD ³ return (total salmon)	Permits fished	Avg. days fished per permit	Total permit-days fished	Permits fished	Avg. days fished per permit	Total permit-days fished	Avg. harvest per 100k <i>Inriver</i>	Avg. harvest per permit	Avg. harvest per 100k GSD return	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k <i>Inriver</i>	Avg. harvest per permit	Avg. harvest per 100k GSD return	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k <i>Inriver</i>	Avg. harvest per permit	Avg. harvest per 100k GSD return	Harvest per day fished (catch per unit effort)
2004	3.2	684,103	575,576	222	4.2	929	42	8.7	364	75.3	11.0	13.1	18	164.5	24.1	28.6	19	164.5	24.1	28.6	19
2005	-12.7	855,125	732,662	232	4.3	993	39	7.6	295	85.6	10.0	11.7	20	120.9	14.1	16.5	16	120.9	14.1	16.5	16
2006	-3.3	959,706	834,896	215	4.1	885	55	6.2	343	78.2	8.1	9.4	19	112.3	11.7	13.5	18	112.3	11.7	13.5	18
2007	-16.1	919,601	793,447	246	4.6	1,142	52	8.0	416	74.3	8.1	9.4	16	128.1	13.9	16.1	16	128.1	13.9	16.1	16
2008	-25.4	718,344	636,026	239	4.6	1,103	51	7.9	404	60.0	8.4	9.4	13	118.7	16.5	18.7	15	118.7	16.5	18.7	15
2009	-24.6	709,748	618,831	225	5.0	1,114	53	5.5	290	74.3	10.5	12.0	15	93.0	13.1	15.0	17	93.0	13.1	15.0	17
2010	-20.3	923,811	783,000	243	4.7	1,141	72	5.1	369	98.6	10.7	12.6	21	87.2	9.4	11.1	17	87.2	9.4	11.1	17
2011	-7.8	914,231	784,246	246	4.6	1,140	63	5.8	367	69.5	7.6	8.9	15	93.2	10.2	11.9	16	93.2	10.2	11.9	16
2012	-14.0	1,294,400	1,166,342	272	4.1	1,114	64	6.0	382	86.0	6.6	7.4	21	101.4	7.8	8.7	17	101.4	7.8	8.7	17
2013	-33.1	1,267,060	1,084,145	236	3.6	852	59	3.8	227	86.7	6.8	8.0	24	96.2	7.6	8.9	25	96.2	7.6	8.9	25
2014	-7.7	1,218,418	1,059,539	222	4.2	937	75	6.1	459	84.4	6.9	8.0	20	116.2	9.5	11.0	19	116.2	9.5	11.0	19
2015	-8.3	1,346,100	1,120,675	243	4.1	989	77	5.7	556	93.6	7.0	8.4	23	113.6	8.4	10.1	20	113.6	8.4	10.1	20
2016	-3.2	801,593	651,290	208	4.1	846	98	8.3	640	77.3	9.6	11.9	19	108.1	13.5	16.6	13	108.1	13.5	16.6	13
2017	-8.1	723,426	589,132	138	4.8	659	92	5.7	522	66.8	9.2	11.3	14	85.1	11.8	14.4	15	85.1	11.8	14.4	15
2018	-57.3	701,577	621,035	168	3.5	585	115	4.9	562	73.2	10.4	11.8	21	102.7	14.6	16.5	21	102.7	14.6	16.5	21
2019	-4.9	1,039,354	863,941	188	3.6	676	92	6.4	585	64.7	6.2	7.5	18	101.8	9.8	11.8	16	101.8	9.8	11.8	16
2020	-31.7	530,313	448,885	198	3.0	602	96	6.2	597	39.5	7.5	8.8	13	74.6	14.1	16.6	12	74.6	14.1	16.6	12
2021	-9.4	751,262	602,546	223	2.4	546	90	6.3	563	39.2	5.2	6.5	16	81.3	10.8	13.5	13	81.3	10.8	13.5	13
2022	-15.4	785,509	627,565	191	2.4	466	88	6.9	604	48.8	6.2	7.8	20	89.2	11.4	14.2	13	89.2	11.4	14.2	13
2023	-37.7	991,740	817,208	244	2.4	597	76	7.2	548	46.5	4.7	5.7	19	108.2	10.9	13.2	15	108.2	10.9	13.2	15
10-yr avg. 2004-2013	-15.4	924,612.9	800,917.1	237.6	4.4	1,041.2	55.0	6.5	345.6	78.8	8.8	10.2	18.2	111.6	12.9	14.9	17.6	111.6	12.9	14.9	17.6
10-yr avg. 2014-2023	-18.4	888,929.2	740,181.6	202.3	3.5	690.4	89.9	6.4	563.7	63.4	7.3	8.8	18.3	98.1	11.5	13.8	15.7	98.1	11.5	13.8	15.7
5-yr avg. 2019-2023	-19.8	819,635.6	672,029.0	208.8	2.8	577.4	88.4	6.6	579.4	47.7	6.0	7.3	17.2	91.0	11.4	13.9	13.8	91.0	11.4	13.9	13.8
10-yr CV ⁴ 2004-2013	71.2	23.0	24.0	6.7	9.0	11.1	18.2	23.5	16.9	13.7	18.5	19.7	18.8	20.8	38.0	39.1	16.1	20.8	38.0	39.1	16.1
10-yr CV 2014-2023	97.5	28.5	29.5	16.4	24.3	25.3	13.5	14.8	8.8	30.3	26.2	25.1	17.1	14.8	17.8	17.1	20.6	14.8	17.8	17.1	20.6
5-yr CV 2019-2023	71.8	25.0	22.8	11.5	18.5	13.4	8.5	6.6	4.0	21.8	17.9	16.6	16.1	15.3	14.1	12.8	11.9	15.3	14.1	12.8	11.9

¹ Sum of sonar passage percent minus commercial harvest percent for statistical weeks 20-22, with passage and harvest percent calculated on basis of season totals.

² Sonar passage

³ Sonar passage - Chilina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Brenner & Chilina river drainages and thus do not reach the GSD)

⁴ Coefficient of variation (CV) calculated as 100*(StdDev/mean)

Subsistence Participation & Harvest, Gakona-Slana

Table C3a. Measures of participation and harvest (total salmon) in the Upper Copper River subsistence salmon fisheries in the Gakona-Slana reach, years 2002-2023 (ADF&G and NPS data).

Year	Early season sonar-harvest balance ¹	Participation in State subsistence fishery					Participation in Federal subsistence fishery					Harvest (total salmon) in State subsistence fishery					Harvest (total salmon) in Federal subsistence fishery				
		<i>Inriver</i> ² return (salmon)	GSD ³ return (total salmon)	Permits fished	Avg. days fished per permit	Total permit-days fished	Permits fished	Avg. days fished per permit	Total permit-days fished	Avg. harvest per permit	Avg. harvest per 100k <i>inriver</i>	Avg. harvest per permit	Avg. harvest per 100k <i>inriver</i>	Avg. harvest per permit	Avg. harvest per 100k <i>inriver</i>	Avg. harvest per permit	Avg. harvest per 100k <i>inriver</i>	Harvest per day fished (catch per unit effort)	Harvest per permit per 100k GSD return	Harvest per day fished (catch per unit effort)	Harvest per permit per 100k GSD return
2004	3.2	684,103	575,576	85	2.7	233	50	3.7	185	84.9	12.4	14.7	12.4	14.7	140.8	20.6	24.5	31	24.5	38	24.5
2005	-12.7	855,125	732,662	37	4.6	171	79	3.1	245	78.6	9.2	10.7	9.2	10.7	102.5	12.0	14.0	17	14.0	33	14.0
2006	-3.3	959,706	834,896	35	6.0	209	71	4.2	296	59.7	6.2	7.2	6.2	7.2	91.7	9.6	11.0	10	11.0	22	11.0
2007	-16.1	919,601	793,447	37	8.5	315	76	3.9	297	93.7	10.2	11.8	10.2	11.8	54.8	6.0	6.9	11	6.9	14	6.9
2008	-25.4	718,344	636,026	32	8.3	264	45	5.5	248	66.1	9.2	10.4	9.2	10.4	60.6	8.4	9.5	8	9.5	11	9.5
2009	-24.6	709,748	618,831	37	5.3	195	76	4.3	329	68.5	9.7	11.1	9.7	11.1	60.7	8.5	9.8	13	9.8	14	9.8
2010	-20.3	923,811	783,000	50	5.3	267	61	3.7	225	69.5	7.5	8.9	7.5	8.9	62.8	6.8	8.0	13	8.0	17	8.0
2011	-7.8	914,231	784,246	43	10.7	462	75	3.1	233	64.5	7.1	8.2	7.1	8.2	62.2	6.8	7.9	6	7.9	20	7.9
2012	-14.0	1,294,400	1,166,342	47	7.4	348	69	2.5	173	66.6	5.1	5.7	5.1	5.7	60.0	4.6	5.1	9	5.1	24	5.1
2013	-33.1	1,267,060	1,084,145	31	4.6	143	71	3.4	242	82.9	6.5	7.6	6.5	7.6	109.1	8.6	10.1	18	10.1	32	10.1
2014	-7.7	1,218,418	1,059,539	29	8.3	240	93	3.3	311	99.1	8.1	9.4	8.1	9.4	100.5	8.2	9.5	12	9.5	30	9.5
2015	-8.3	1,346,100	1,120,675	37	7.9	291	85	2.9	249	117.9	8.8	10.5	8.8	10.5	102.4	7.6	9.1	15	9.1	35	9.1
2016	-3.2	801,593	651,290	29	6.2	179	71	5.0	354	80.4	10.0	12.4	10.0	12.4	74.7	9.3	11.5	13	11.5	15	11.5
2017	-8.1	723,426	589,132	16	7.3	118	90	3.1	275	88.1	12.2	15.0	12.2	15.0	76.4	10.6	13.0	12	13.0	25	13.0
2018	-57.3	701,577	621,035	20	7.0	139	61	3.4	207	69.6	9.9	11.2	9.9	11.2	61.0	8.7	9.8	10	9.8	18	9.8
2019	-4.9	1,039,354	863,941	39	4.6	178	81	3.1	252	68.3	6.6	7.9	6.6	7.9	59.0	5.7	6.8	15	6.8	19	6.8
2020	-31.7	530,313	448,885	26	5.0	130	51	2.2	111	40.1	7.6	8.9	7.6	8.9	41.3	7.8	9.2	8	9.2	19	9.2
2021	-9.4	751,262	602,546	30	5.1	153	53	3.8	202	66.1	8.8	11.0	8.8	11.0	61.0	8.1	10.1	13	10.1	16	10.1
2022	-15.4	785,509	627,565	31	3.6	112	37	4.1	151	61.3	7.8	9.8	7.8	9.8	32.7	4.2	5.2	17	5.2	8	5.2
2023	-37.7	991,740	817,208	15	5.4	80	35	3.9	138	58.9	5.9	7.2	5.9	7.2	35.4	3.6	4.3	11	4.3	9	4.3
10-yr avg. 2004-2013	-15.4	924,612.9	800,917.1	43.4	6.3	260.7	67.3	3.7	247.4	73.5	8.3	9.6	8.3	9.6	80.5	9.2	10.7	13.6	10.7	22.5	10.7
10-yr avg. 2014-2023	-18.4	888,929.2	740,181.6	27.2	6.0	161.9	65.7	3.5	224.9	75.0	8.6	10.3	8.6	10.3	64.5	7.4	8.9	12.6	8.9	19.4	8.9
5-yr avg. 2019-2023	-19.8	819,635.6	672,029.0	28.2	4.7	130.5	51.4	3.4	170.7	58.9	7.3	9.0	7.3	9.0	45.9	5.9	7.1	12.8	7.1	14.2	7.1
10-yr CV ⁴ 2004-2013	71.2	23.0	24.0	36.5	37.2	36.4	17.3	22.1	19.9	14.8	26.4	27.4	26.4	27.4	36.0	48.9	50.6	52.8	48.9	40.7	50.6
10-yr CV 2014-2023	97.5	28.5	29.5	29.8	25.6	39.1	32.6	22.1	34.7	29.6	21.2	21.8	21.2	21.8	38.1	30.3	30.3	20.9	30.3	44.1	30.3
5-yr CV 2019-2023	71.8	25.0	22.8	31.1	14.6	28.6	35.8	23.2	32.8	18.9	15.2	16.6	15.2	16.6	28.9	35.1	34.9	27.3	35.1	37.7	34.9

¹ Sum of sonar passage percent minus commercial harvest percent for statistical weeks 20-22, with passage and harvest percent calculated on basis of season totals.

² Sonar passage

³ Sonar passage - Chitina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

⁴ Coefficient of variation (CV) calculated as 100*(StdDev/mean)

Subsistence Participation & Harvest, Gakona-Slana

Table C3b. Measures of **participation** and **harvest** (total salmon) in the Upper Copper River subsistence salmon fisheries in the **Gakona-Slana reach**, years 2002-2023 (ADF&G and NPS data). Cells for all annual data and 10-yr and 5-yr averages are colored from green for the lowest values to red for the highest values in the set of cells contained within the same **thick outside borders**. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green indicating low CV values.

Year	Early season sonar-harvest balance ¹	Participation in State subsistence fishery					Participation in Federal subsistence fishery			Harvest (total salmon) in State subsistence fishery				Harvest (total salmon) in Federal subsistence fishery			
		Inriver ² return (total salmon)	GSD ³ return (total salmon)	Permits fished	Avg. days fished per permit	Total permit-days fished	Permits fished	Avg. days fished per permit	Total permit-days fished	Avg. harvest per 100K inriver	Avg. harvest per permit return	Avg. harvest per 100K GSD	Harvest per day fished (catch per unit effort)	Avg. harvest per 100K inriver	Avg. harvest per permit return	Avg. harvest per 100K GSD	Harvest per day fished (catch per unit effort)
2004	-3.2	684,103	575,576	85	2.7	233	50	3.7	185	84.9	12.4	14.7	31	140.8	20.6	24.5	38
2005	-12.7	855,125	732,662	37	4.6	171	79	3.1	245	78.6	9.2	10.7	17	102.5	12.0	14.0	33
2006	-3.3	959,706	834,896	35	6.0	209	71	4.2	296	59.7	6.2	7.2	10	91.7	9.6	11.0	22
2007	-16.1	919,601	793,447	37	8.5	315	76	3.9	297	93.7	10.2	11.8	11	54.8	6.0	6.9	14
2008	-25.4	718,344	636,026	32	8.3	264	45	5.5	248	66.1	9.2	10.4	8	60.6	8.4	9.5	11
2009	-24.6	709,748	618,831	37	5.3	195	76	4.3	329	68.5	9.7	11.1	13	60.7	8.5	9.8	14
2010	-20.3	923,811	783,000	50	5.3	267	61	3.7	225	69.5	7.5	8.9	13	62.8	6.8	8.0	17
2011	-7.8	914,231	784,246	43	10.7	462	75	3.1	233	64.5	7.1	8.2	6	62.2	6.8	7.9	20
2012	-14.0	1,294,400	1,166,342	47	7.4	348	69	2.5	173	66.6	5.1	5.7	9	60.0	4.6	5.1	24
2013	-33.1	1,287,060	1,084,145	31	4.6	143	71	3.4	242	82.9	6.5	7.6	18	109.1	8.6	10.1	32
2014	-7.7	1,218,418	1,059,539	29	8.3	240	93	3.3	311	99.1	8.1	9.4	12	100.5	8.2	9.5	30
2015	-8.3	1,346,100	1,120,675	37	7.9	291	85	2.9	249	117.9	8.8	10.5	15	102.4	7.6	9.1	35
2016	-3.2	801,593	651,290	29	6.2	179	71	5.0	354	80.4	10.0	12.4	13	74.7	9.3	11.5	15
2017	-8.1	723,426	589,132	16	7.3	118	90	3.1	275	88.1	12.2	15.0	12	76.4	10.6	13.0	25
2018	-57.3	701,577	621,035	20	7.0	139	61	3.4	207	69.6	9.9	11.2	10	61.0	8.7	9.8	18
2019	-4.9	1,039,354	863,941	39	4.6	178	81	3.1	252	68.3	6.6	7.9	15	59.0	5.7	6.8	19
2020	-31.7	530,313	448,885	26	5.0	130	51	2.2	111	40.1	7.6	8.9	8	41.3	7.8	9.2	19
2021	-9.4	751,262	602,546	30	5.1	153	53	3.8	202	66.1	8.8	11.0	13	61.0	8.1	10.1	16
2022	-15.4	785,509	627,565	31	3.6	112	37	4.1	151	61.3	7.8	9.8	17	32.7	4.2	5.2	8
2023	-37.7	991,740	817,208	15	5.4	80	35	3.9	138	58.9	5.9	7.2	11	35.4	3.6	4.3	9
10-yr avg. 2004-2013	-15.4	924,612.9	800,917.1	43.4	6.3	260.7	67.3	3.7	247.4	73.5	8.3	9.6	13.6	80.5	9.2	10.7	22.5
10-yr avg. 2014-2023	-18.4	888,929.2	740,181.6	27.2	6.0	161.9	65.7	3.5	224.9	75.0	8.6	10.3	12.6	64.5	7.4	8.9	19.4
5-yr avg. 2019-2023	-19.8	819,635.6	672,029.0	28.2	4.7	130.5	51.4	3.4	170.7	58.9	7.3	9.0	12.8	45.9	5.9	7.1	14.2
10-yr CV ⁴ 2004-2013	71.2	23.0	24.0	36.5	37.2	36.4	17.3	22.1	19.9	14.8	26.4	27.4	52.8	36.0	48.9	50.6	40.7
10-yr CV 2014-2023	97.5	28.5	29.5	29.8	25.6	39.1	32.6	22.1	34.7	29.6	21.2	21.8	20.9	38.1	30.3	30.3	44.1
5-yr CV 2019-2023	71.8	25.0	22.8	31.1	14.6	28.6	35.8	23.2	32.8	18.9	15.2	16.6	27.3	28.9	35.1	34.9	37.7

¹ Sum of sonar passage percent minus commercial harvest percent for statistical weeks 20-22, with passage and harvest percent calculated on basis of season totals.

² Sonar passage

³ Sonar passage - Chitina SD harvest: (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Brenner & Chitina river drainages and thus do not reach the GSD)

⁴ Coefficient of variation (CV) calculated as $100 \times (\text{StdDev}/\text{mean})$

Subsistence Participation, Comparison Among Reaches

Table C4a. Descriptive statistics, average (avg.) and coefficient of variation (CV¹), for measures of participation in State and Federal subsistence fisheries in three reaches² of the Glennallen Subdistrict during years 2004-2023 (derived from ADF&G and NPS data provided by ADF&G).

Period & statistic	Permits fished						Days fished per permit						Total permit-days fished					
	State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg. 2004-2013	585.9	237.6	43.4	38.3	55.0	67.3	2.8	4.4	6.3	4.2	6.5	3.7	1634.0	1041.2	260.7	158.2	345.6	247.4
10-yr avg. 2014-2023	824.4	202.3	27.2	26.9	89.9	65.7	1.9	3.5	6.0	4.4	6.4	3.5	1537.7	690.4	161.9	118.4	563.7	224.9
5-yr avg. 2019-2023	778.2	208.8	28.2	26.6	88.4	51.4	1.7	2.8	4.7	4.3	6.6	3.4	1308.6	577.4	130.5	112.8	579.4	170.7
10-yr CV 2004-2013	19.4	6.7	36.5	25.8	18.2	17.3	10.7	9.0	37.2	17.1	23.5	22.1	14.2	11.1	36.4	28.3	16.9	19.9
10-yr CV 2014-2023	11.0	16.4	29.8	26.9	13.5	32.6	12.7	24.3	25.6	15.6	14.8	22.1	20.6	25.3	39.1	34.2	8.8	34.7
5-yr CV 2019-2023	19.1	11.5	31.1	21.4	8.5	35.8	15.0	18.5	14.6	14.4	6.6	23.2	8.9	13.4	28.6	22.9	4.0	32.8

¹Coefficient of variation (CV) calculated as 100*(StdDev/mean)

² River reaches Bridge-Tonsina (B-T), Tonsina-Gakona (T-G), and Gakona-Slana (G-S)

Subsistence Participation, Comparison Among Reaches

Table C4b. Descriptive statistics, average (avg.) and coefficient of variation (CV¹), for measures of **participation** in State and Federal subsistence fisheries in **three reaches**² of the Glennallen Subdistrict during years 2004-2023 (derived from ADF&G and NPS data provided by ADF&G). Cells for averages are colored from green for the highest values to red for the lowest values among the three reaches for a given fishery and period / statistic. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green indicating low CV values.

Period & statistic	Permits fished									Days fished per permit									Total permit-days fished								
	State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery			State fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg. 2004-2013	585.9	237.6	43.4	38.3	55.0	67.3	2.8	4.4	6.3	4.2	6.5	3.7	1634.0	1041.2	260.7	158.2	345.6	247.4	158.2	345.6	247.4	158.2	345.6	247.4	158.2	345.6	247.4
10-yr avg. 2014-2023	824.4	202.3	27.2	26.9	89.9	65.7	1.9	3.5	6.0	4.4	6.4	3.5	1537.7	690.4	161.9	118.4	563.7	224.9	118.4	563.7	224.9	118.4	563.7	224.9	118.4	563.7	224.9
5-yr avg. 2019-2023	778.2	208.8	28.2	26.6	88.4	51.4	1.7	2.8	4.7	4.3	6.6	3.4	1308.6	577.4	130.5	112.8	579.4	170.7	112.8	579.4	170.7	112.8	579.4	170.7	112.8	579.4	170.7
10-yr CV 2004-2013	19.4	6.7	36.5	25.8	18.2	17.3	10.7	9.0	37.2	17.1	23.5	22.1	14.2	11.1	36.4	28.3	16.9	19.9	28.3	16.9	19.9	28.3	16.9	19.9	28.3	16.9	19.9
10-yr CV 2014-2023	11.0	16.4	29.8	26.9	13.5	32.6	12.7	24.3	25.6	15.6	14.8	22.1	20.6	25.3	39.1	34.2	8.8	34.7	34.2	8.8	34.7	34.2	8.8	34.7	34.2	8.8	34.7
5-yr CV 2019-2023	19.1	11.5	31.1	21.4	8.5	35.8	15.0	18.5	14.6	14.4	6.6	23.2	8.9	13.4	28.6	22.9	4.0	32.8	22.9	4.0	32.8	22.9	4.0	32.8	22.9	4.0	32.8

¹Coefficient of variation (CV) calculated as 100*(StdDev/mean)

²River reaches Bridge-Tonsina (B-T), Tonsina-Gakona (T-G), and Gakona-Slana (G-S)

Subsistence Participation, Comparison Among Years by Reach

Table C4c. Descriptive statistics, average (avg.) and coefficient of variation (CV¹), for measures of **participation** in State and Federal subsistence fisheries in **three reaches**² of the Glennallen Subdistrict during years 2004-2023 (derived from ADF&G and NPS data provided by ADF&G). Cells for averages are colored from green for the highest values to red for the lowest values among time periods / statistics for a given fishery and reach. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green indicating low CV values.

Period & statistic	Permits fished						Days fished per permit						Total permit-days fished					
	State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg. 2004-2013	585.9	237.6	43.4	38.3	55.0	67.3	2.8	4.4	6.3	4.2	6.5	3.7	1634.0	1041.2	260.7	158.2	345.6	247.4
10-yr avg. 2014-2023	824.4	202.3	27.2	26.9	89.9	65.7	1.9	3.5	6.0	4.4	6.4	3.5	1537.7	690.4	161.9	118.4	563.7	224.9
5-yr avg. 2019-2023	778.2	208.8	28.2	26.6	88.4	51.4	1.7	2.8	4.7	4.3	6.6	3.4	1308.6	577.4	130.5	112.8	579.4	170.7
10-yr CV 2004-2013	19.4	6.7	36.5	25.8	18.2	17.3	10.7	9.0	37.2	17.1	23.5	22.1	14.2	11.1	36.4	28.3	16.9	19.9
10-yr CV 2014-2023	11.0	16.4	29.8	26.9	13.5	32.6	12.7	24.3	25.6	15.6	14.8	22.1	20.6	25.3	39.1	34.2	8.8	34.7
5-yr CV 2019-2023	19.1	11.5	31.1	21.4	8.5	35.8	15.0	18.5	14.6	14.4	6.6	23.2	8.9	13.4	28.6	22.9	4.0	32.8

¹Coefficient of variation (CV) calculated as 100*(StdDev/mean)

² River reaches Bridge-Tonsina (B-T), Tonsina-Gakona (T-G), and Gakona-Siana (G-S)

Subsistence Harvest, Comparison Among Reaches

Table C5a. Descriptive statistics, average (avg.) and coefficient of variation (CV¹), for measures of salmon **harvest** in State and Federal subsistence fisheries in **three reaches²** of the Glennallen Subdistrict (GSD) during years 2004-2023 (derived from ADF&G and NPS data provided by ADF&G).

Period & statistic	Harvest per permit						Harvest per permit per 100k <i>inriver</i> return ³						Harvest per permit per 100k GSD return ⁴						Harvest per day fished (catch per unit effort)					
	State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg. 2004-2013	64.9	78.8	73.5	102.2	111.6	80.5	7.3	8.8	8.3	11.3	12.9	9.2	8.5	10.2	9.6	13.1	14.9	10.7	23.1	18.2	13.6	25.5	17.6	22.5
10-yr avg. 2014-2023	42.5	63.4	75.0	101.1	98.1	64.5	4.9	7.3	8.6	11.8	11.5	7.4	5.9	8.8	10.3	14.2	13.8	8.9	23.1	18.3	12.6	23.4	15.7	19.4
5-yr avg. 2019-2023	42.8	47.7	58.9	103.5	91.0	45.9	5.4	6.0	7.3	12.9	11.4	5.9	6.6	7.3	9.0	15.8	13.9	7.1	25.6	17.2	12.8	24.4	13.8	14.2
10-yr CV 2004-2013	21.0	13.7	14.8	37.6	20.8	36.0	29.4	18.5	26.4	37.8	38.0	48.9	30.7	19.7	27.4	38.2	39.1	50.6	20.7	18.8	52.8	47.7	16.1	40.7
10-yr CV 2014-2023	23.8	30.3	29.6	26.5	14.8	38.1	19.1	26.2	21.2	27.0	17.8	30.3	20.7	25.1	21.8	27.0	17.1	30.3	23.8	17.1	20.9	29.6	20.6	44.1
5-yr CV 2019-2023	19.4	21.8	18.9	37.0	15.3	28.9	20.5	17.9	15.2	36.6	14.1	35.1	21.0	16.6	16.6	36.5	12.8	34.9	20.6	16.1	27.3	36.7	11.9	37.7

¹Coefficient of variation (CV) calculated as 100*(StdDev/mean)

² River reaches Bridge-Tonsina (B-T), Tonsina-Gakona (T-G), and Gakona-Siana (G-S)

³ Inriver return = sonar passage

⁴ GSD return = sonar passage - Chitina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

Subsistence Harvest, Comparison Among Reaches

Table C5b. Descriptive statistics, average (avg.) and coefficient of variation (CV¹), for measures of salmon **harvest** in State and Federal subsistence fisheries in **three reaches**² of the Glennallen Subdistrict (GSD) during years 2004-2023 (derived from ADF&G and NPS data provided by ADF&G). Cells for averages are colored from green for the highest values to red for the lowest values among the three reaches for a given fishery and period / statistic. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green indicating low CV values.

Period & statistic	Harvest per permit						Harvest per permit per 100k <i>inriver</i> return ³						Harvest per permit per 100k GSD return ⁴						Harvest per day fished (catch per unit effort)					
	State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg. 2004-2013	64.9	78.8	73.5	102.2	111.6	80.5	7.3	8.8	8.3	11.3	12.9	9.2	8.5	10.2	9.6	13.1	14.9	10.7	23.1	18.2	13.6	25.5	17.6	22.5
10-yr avg. 2014-2023	42.5	63.4	75.0	101.1	98.1	64.5	4.9	7.3	8.6	11.8	11.5	7.4	5.9	8.8	10.3	14.2	13.8	8.9	23.1	18.3	12.6	23.4	15.7	19.4
5-yr avg. 2019-2023	42.8	47.7	58.9	103.5	91.0	45.9	5.4	6.0	7.3	12.9	11.4	5.9	6.6	7.3	9.0	15.8	13.9	7.1	25.6	17.2	12.8	24.4	13.8	14.2
10-yr CV 2004-2013	21.0	13.7	14.8	37.6	20.8	36.0	29.4	18.5	26.4	37.8	38.0	48.9	30.7	19.7	27.4	38.2	39.1	50.6	20.7	18.8	52.8	47.7	16.1	40.7
10-yr CV 2014-2023	23.8	30.3	29.6	26.5	14.8	38.1	19.1	26.2	21.2	27.0	17.8	30.3	20.7	25.1	21.8	27.0	17.1	30.3	23.8	17.1	20.9	29.6	20.6	44.1
5-yr CV 2019-2023	19.4	21.8	18.9	37.0	15.3	28.9	20.5	17.9	15.2	36.6	14.1	35.1	21.0	16.6	16.6	36.5	12.8	34.9	20.6	16.1	27.3	36.7	11.9	37.7

¹Coefficient of variation (CV) calculated as 100*(StdDev/mean)

²River reaches Bridge-Tonsina (B-T), Tonsina-Gakona (T-G), and Gakona-Slana (G-S)

³Inriver return = sonar passage

⁴GSD return = sonar passage - Chitina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

Subsistence Harvest, Comparison Among Years by Reach

Table C5c. Descriptive statistics, average (avg.) and coefficient of variation (CV¹), for measures of salmon **harvest** in State and Federal subsistence fisheries in **three reaches**² of the Glennallen Subdistrict (GSD) during years 2004-2023 (derived from ADF&G and NPS data provided by ADF&G). Cells for averages are colored from green for the highest values among time periods / statistics for a given fishery and reach. The color scheme for coefficient-of-variation (CV) is reversed, with red indicating high and green the lowest values among time periods / statistics for a given fishery and reach.

Period & statistic	Harvest per permit						Harvest per permit per 100k <i>inriver</i> return ³						Harvest per permit per 100k GSD return ⁴						Harvest per day fished (catch per unit effort)					
	State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery			State fishery			Federal fishery		
	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S	B-T	T-G	G-S
10-yr avg. 2004-2013	64.9	78.8	73.5	102.2	111.6	80.5	7.3	8.8	8.3	11.3	12.9	9.2	8.5	10.2	9.6	13.1	14.9	10.7	23.1	18.2	13.6	25.5	17.6	22.5
10-yr avg. 2014-2023	42.5	63.4	75.0	101.1	98.1	64.5	4.9	7.3	8.6	11.8	11.5	7.4	5.9	8.8	10.3	14.2	13.8	8.9	23.1	18.3	12.6	23.4	15.7	19.4
5-yr avg. 2019-2023	42.8	47.7	58.9	103.5	91.0	45.9	5.4	6.0	7.3	12.9	11.4	5.9	6.6	7.3	9.0	15.8	13.9	7.1	25.6	17.2	12.8	24.4	13.8	14.2
10-yr CV 2004-2013	21.0	13.7	14.8	37.6	20.8	36.0	29.4	18.5	26.4	37.8	38.0	48.9	30.7	19.7	27.4	38.2	39.1	50.6	20.7	18.8	52.8	47.7	16.1	40.7
10-yr CV 2014-2023	23.8	30.3	29.6	26.5	14.8	38.1	19.1	26.2	21.2	27.0	17.8	30.3	20.7	25.1	21.8	27.0	17.1	30.3	23.8	17.1	20.9	29.6	20.6	44.1
5-yr CV 2019-2023	19.4	21.8	18.9	37.0	15.3	28.9	20.5	17.9	15.2	36.6	14.1	35.1	21.0	16.6	16.6	36.5	12.8	34.9	20.6	16.1	27.3	36.7	11.9	37.7

¹ Coefficient of variation (CV) calculated as 100*(StdDev/mean)

² River reaches Bridge-Tonsina (B-T), Tonsina-Gakona (T-G), and Gakona-Slana (G-S)

³ Inriver return = sonar passage

⁴ GSD return = sonar passage - Chitina SD harvest; (note: due to lack of routinely collected genetic stock composition data, this estimate for GSD return does not account for populations that are included in the sonar count but spawn in the Bremner & Chitina river drainages and thus do not reach the GSD)

Attachment D – Figures illustrating annual daily and cumulative curves for Miles Lake sonar passage (*observed* passage and *management objectives* for passage) for years 2003-2024, superimposed with Copper River District commercial harvest amounts (total salmon) by period, also illustrating relevance of the Proposal 51 decision rule.

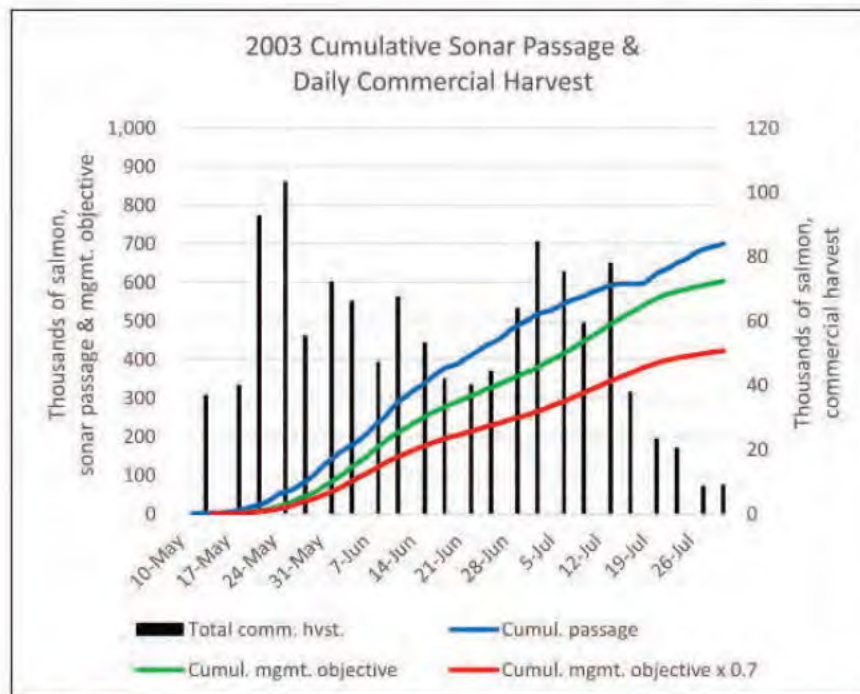
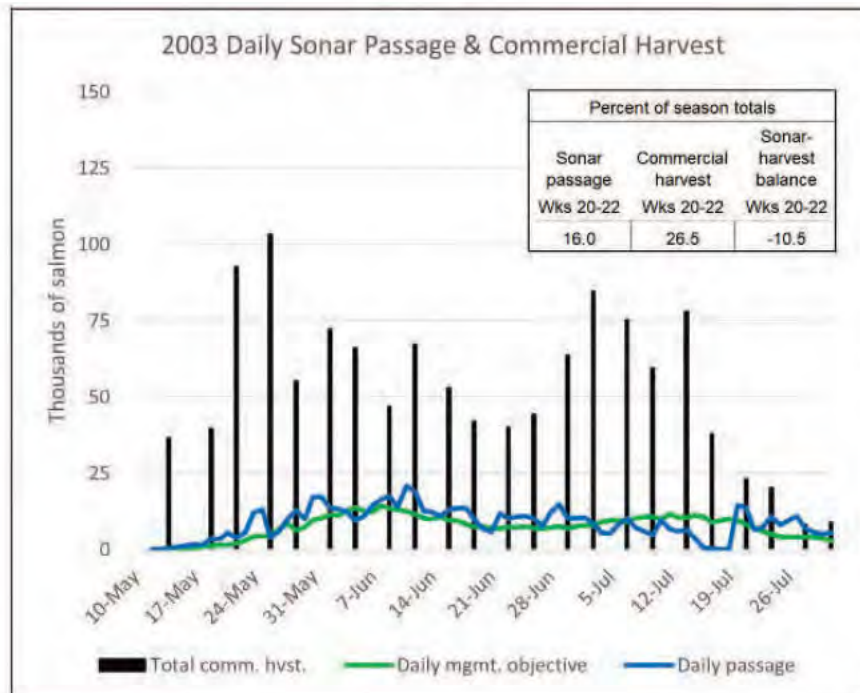
Explanatory notes:

1. Data for years 2003-2023 were compiled by NPS from Prince William Sound Management Area Annual Finfish Management Reports prepared by ADF&G and made available to the public through the Alaska State Library and online at <http://www.adfg.alaska.gov/sf/publications/>. Data for 2024 were compiled by NPS from data posted online by ADF&G during the 2024 fishing season and are to be considered preliminary inseason estimates pending publication of the annual management report.
2. For each year 2003-2024 represented in Attachment C, there are two figures that display annual data for the period 10 May through 31 July (the period bracketing annual operation of the Miles Lake sonar counter). These figures are designed to be like those presented by ADF&G during each season on the website entitled “Upper Copper River Salmon Passage (Miles Lake), Copper River Management Area”³, thus familiar to the public.
 - a. The top figure shows *daily observed and objective sonar counts* (with the daily and cumulative “objective” counts or curves established annually by ADF&G), using colors that match those used for the inseason data shared online by ADF&G. Superimposed on the daily observed and objective sonar curves are bar graphs showing total salmon (sockeye and Chinook only) harvested by the commercial fishery during open fishing periods over the course of the season, with the harvest data for each open period displayed for the date when the open period began. Commercial harvest data for 2003-2023 are from published annual management reports, whereas preliminary harvest data for 2024 are from the website entitled “Inseason Commercial Harvest Estimates, Copper River Commercial Fisheries”⁴.
 - b. The bottom figure shows *cumulative observed and objective sonar counts*, also using colors that match those used for inseason data shared by ADF&G. In addition, the bottom figure includes a red-colored curve that represents 70 percent of the cumulative management objective, corresponding with the proposed decision rule in Proposal 51. Commercial harvest data also are superimposed on the bottom figure.
3. Years when the decision rule outlined in Proposal 51 would or might have been applicable are identified as follows:
 - a. **YEAR**** = *certain applicability* of proposed decision rule.
 - b. **YEAR*** = *potential applicability* of the proposed decision rule, depending on how the rule is operationalized in regulation.
4. Figures for some years are annotated for the purpose of calling out relevant patterns of interest.

³ https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareacopperriver.salmon_escapement

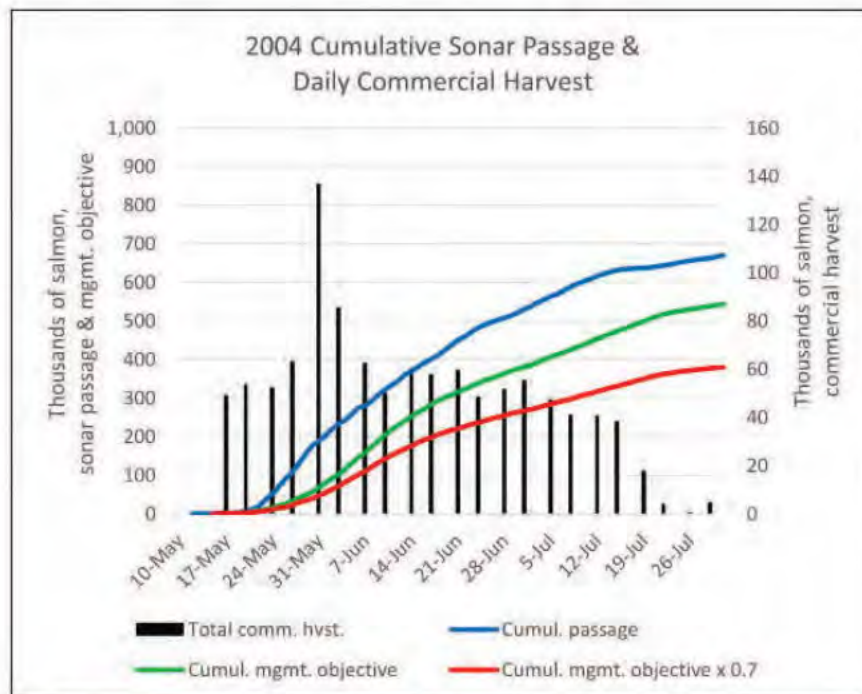
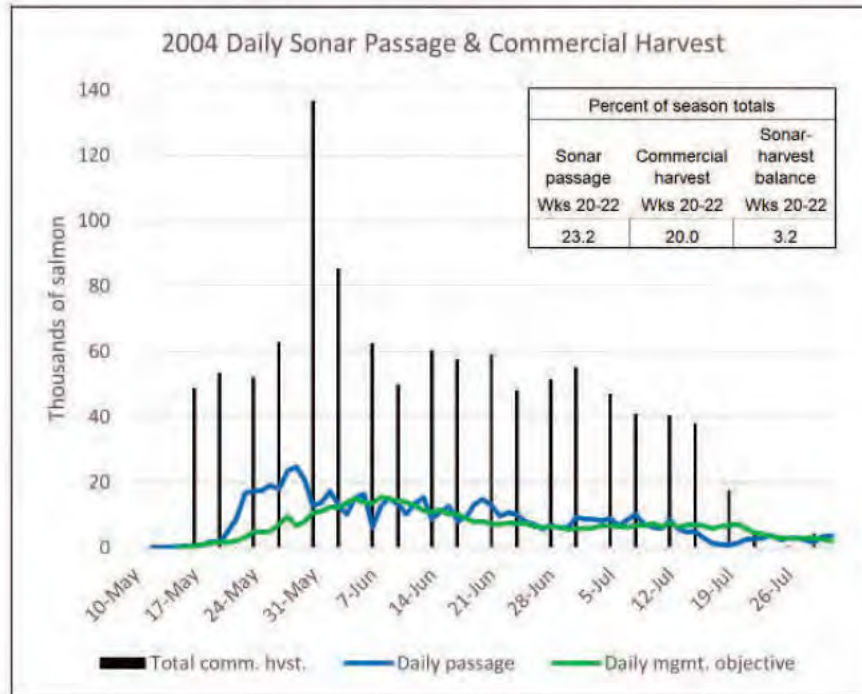
⁴ <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareacopperriver.harvestsummary>

2003



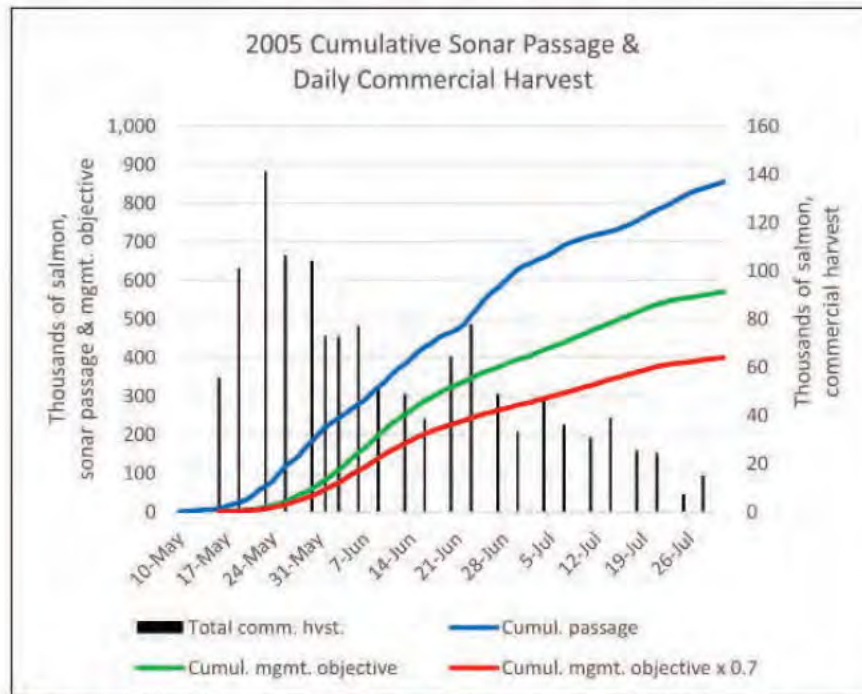
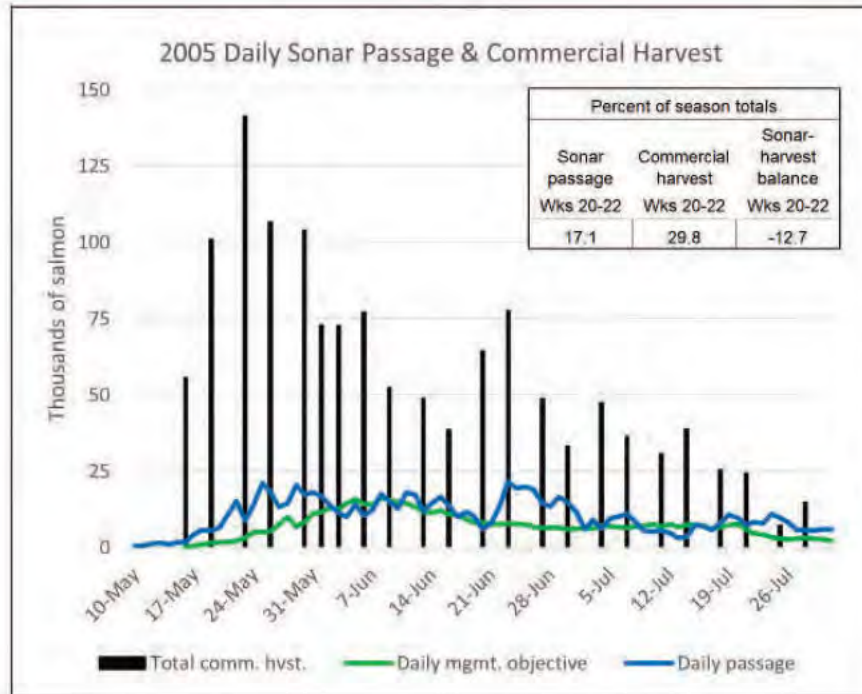
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2004



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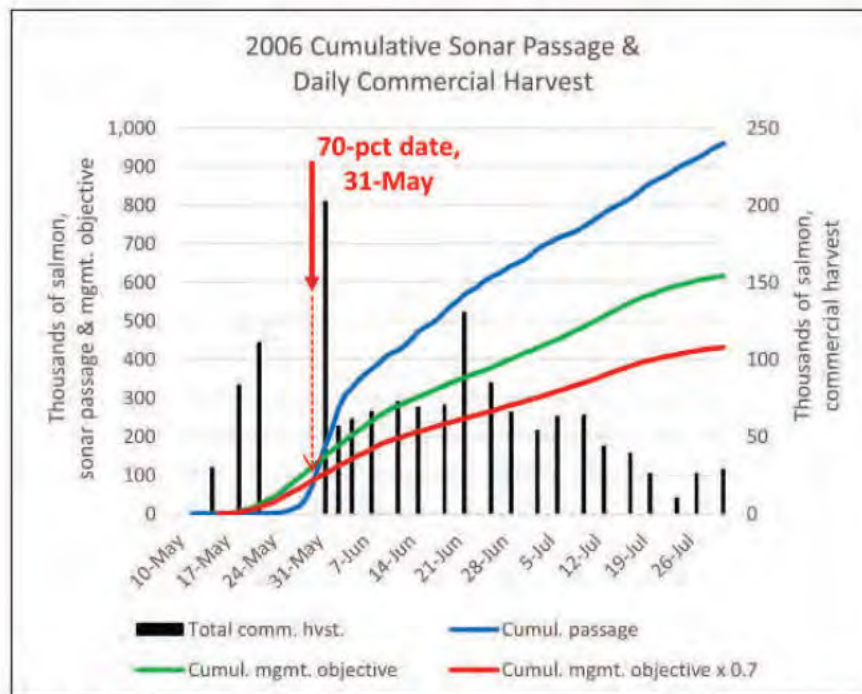
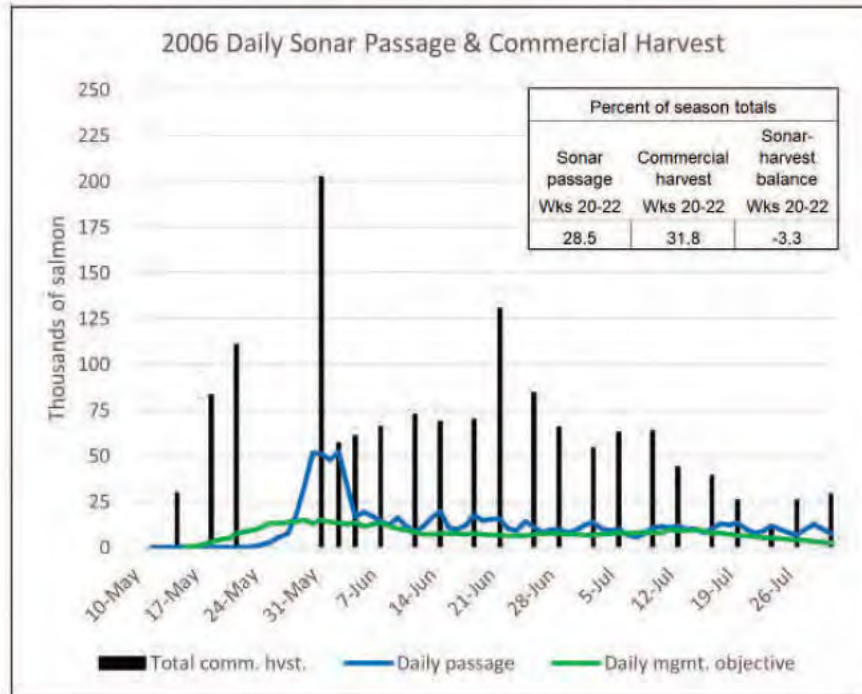
2005



Data from Hollowell et al. 2007, Fishery Management Report No. 07-33

2006**

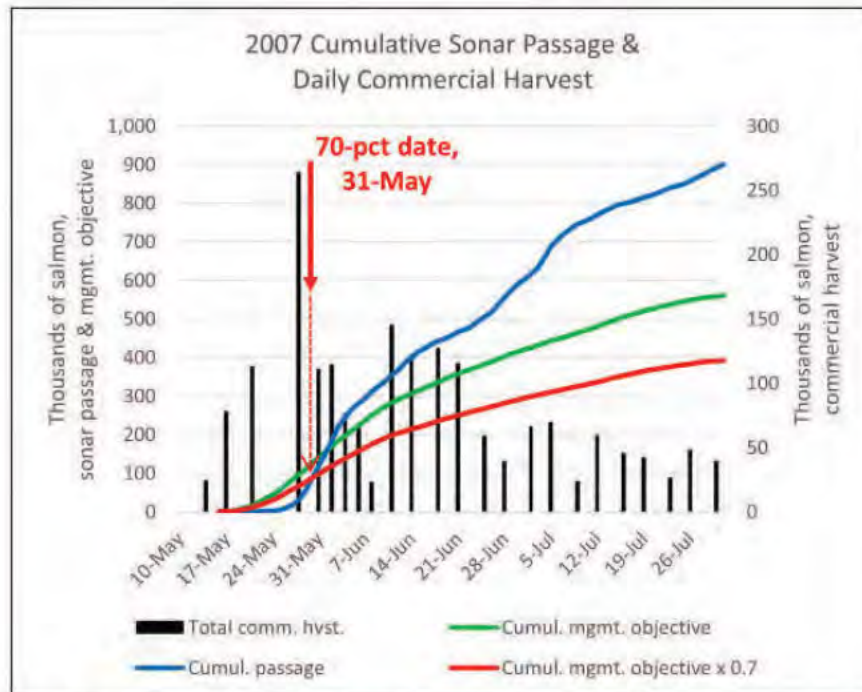
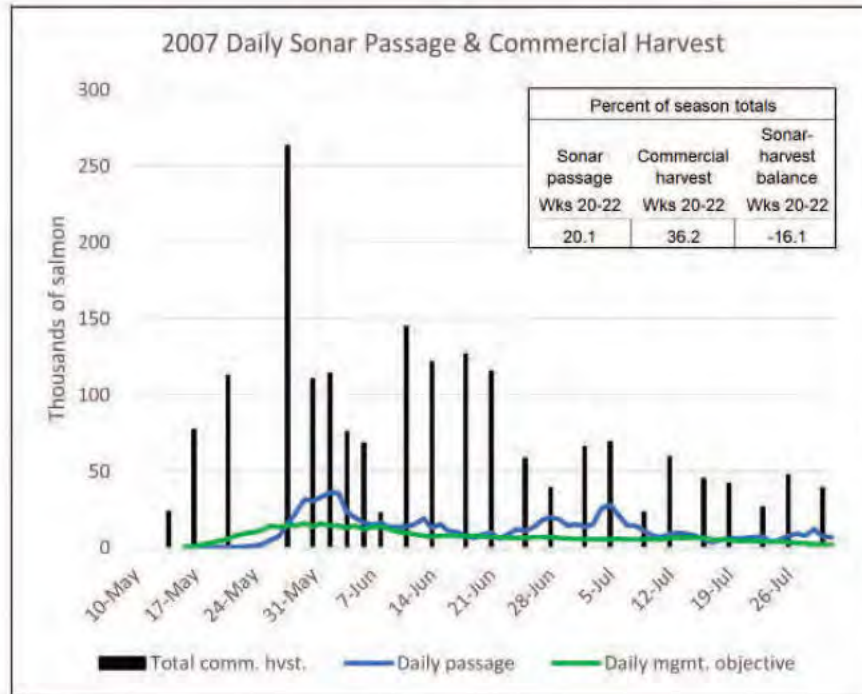
Note
different
y-axis



Data from Botz et al. 2008, Fishery Management Report No. 08-30

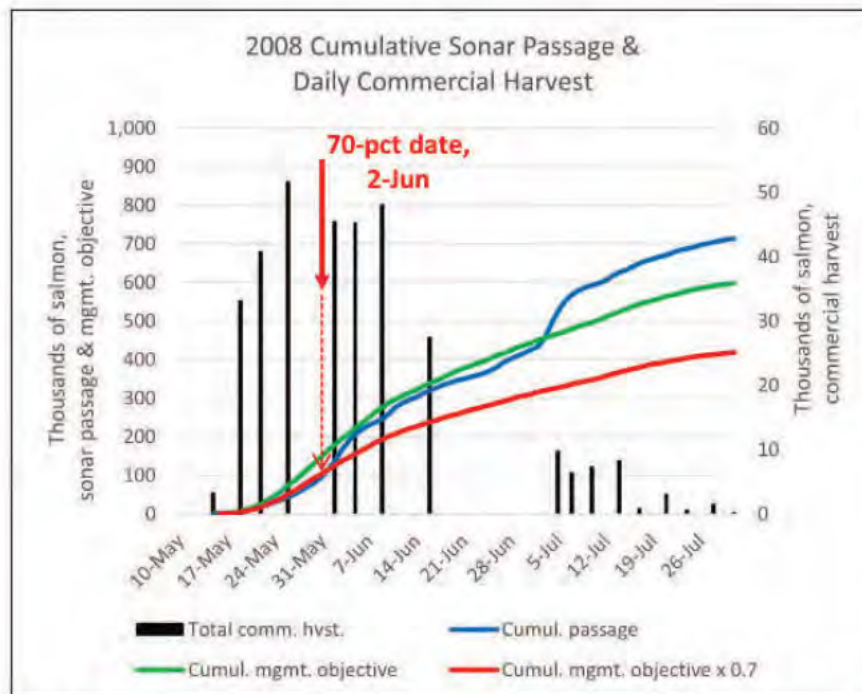
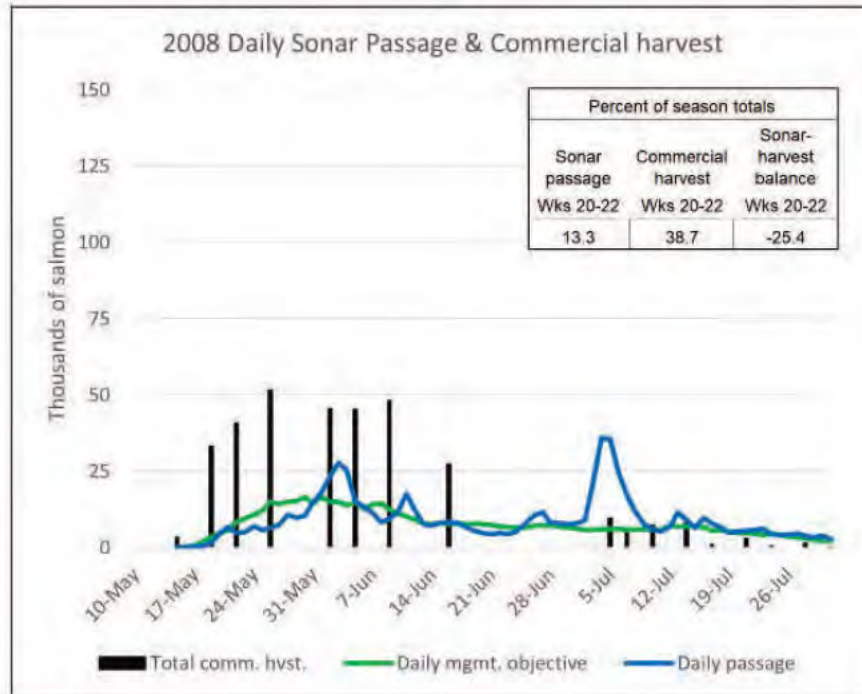
2007**

Note
different
y-axis



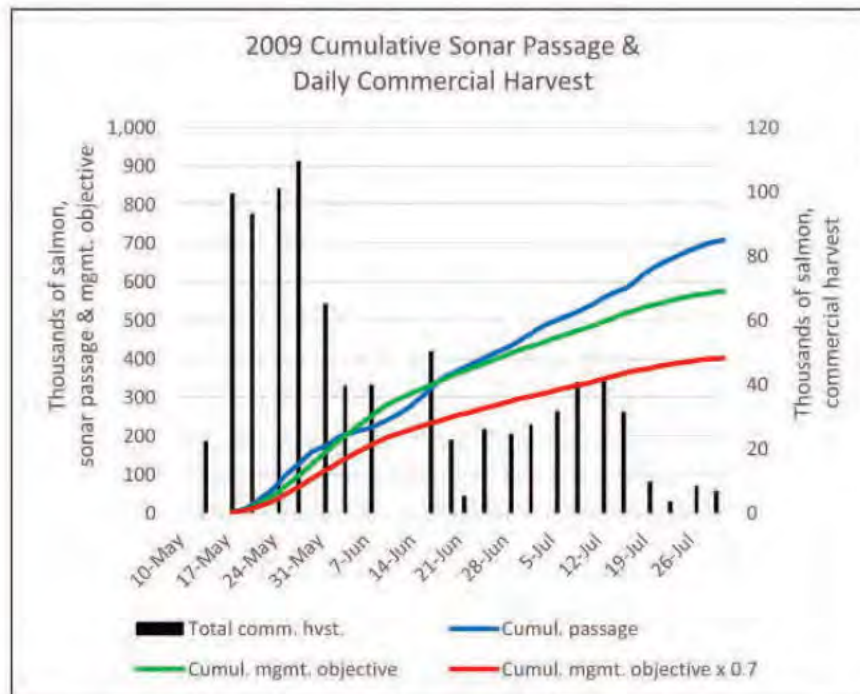
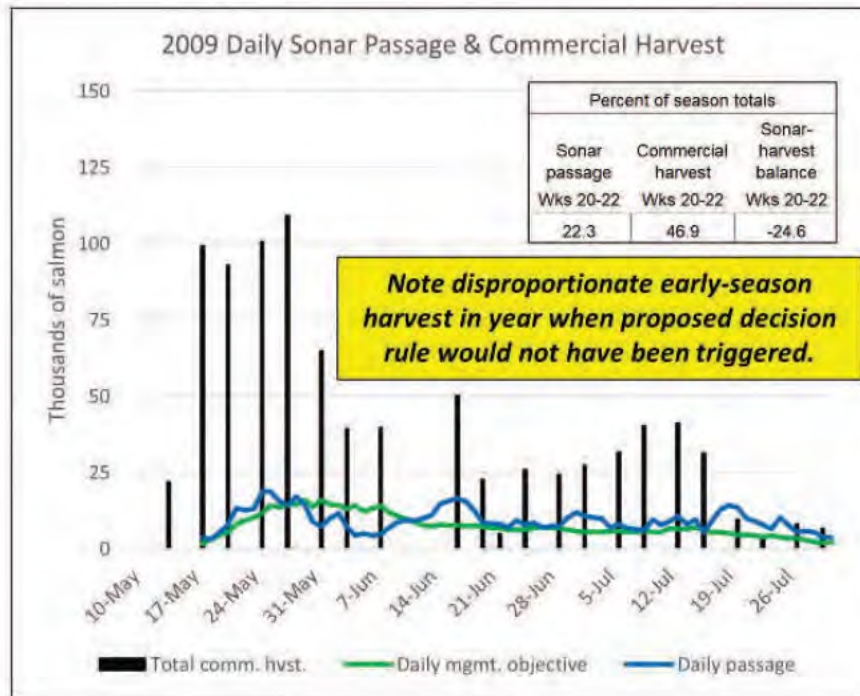
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2008*



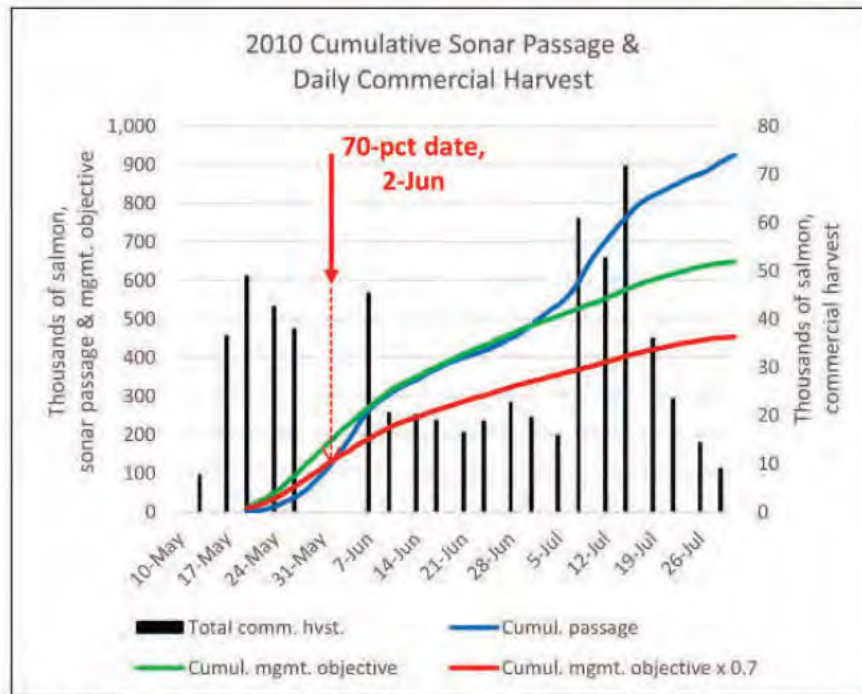
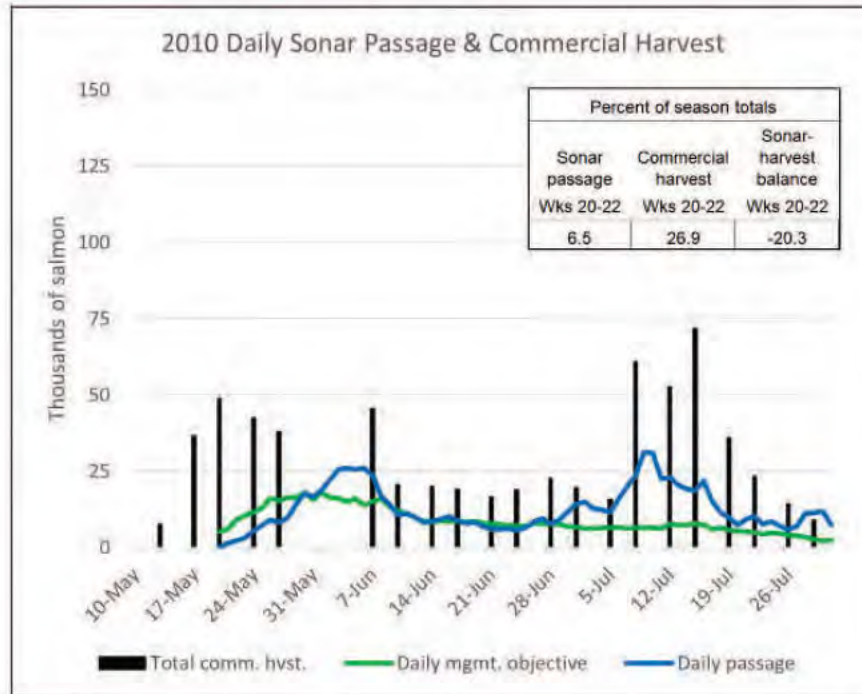
Data from Bell et al. 2010, Fishery Management Report No. 10-45

2009



Data from Botz et al. 2010, Fishery Management Report No. 10-55

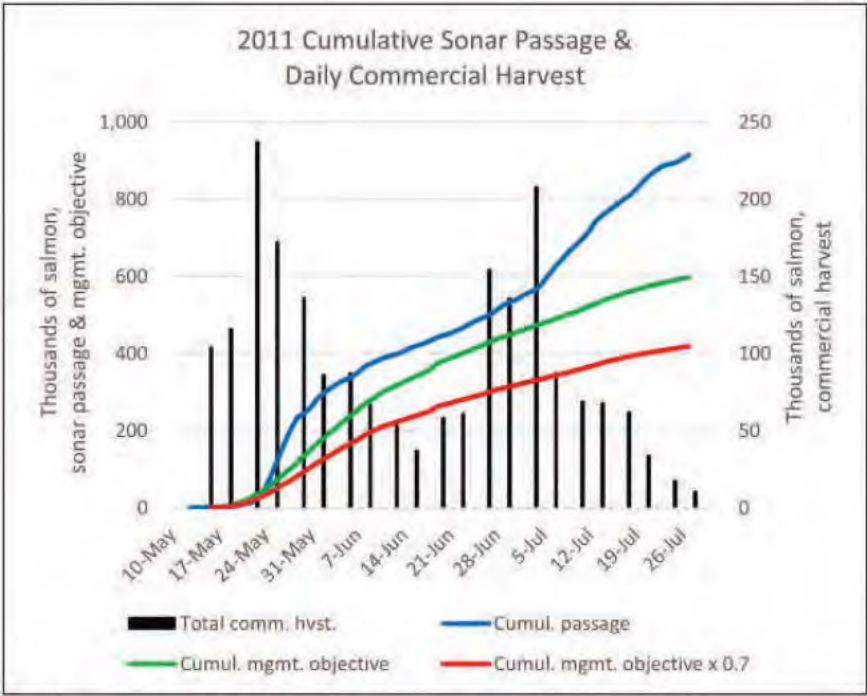
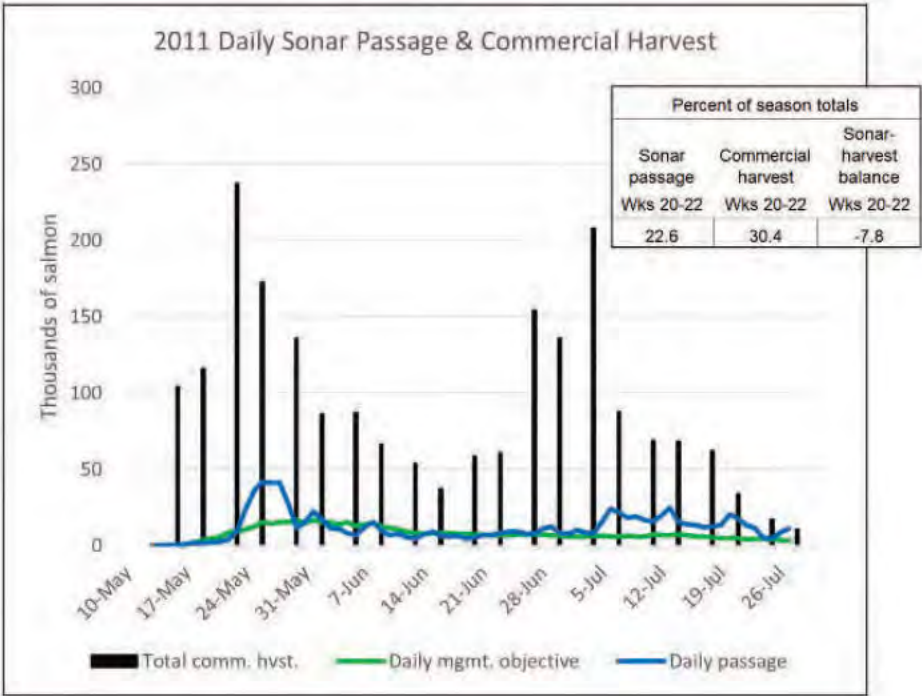
2010**



Data from Botz et al. 2012, Fishery Management Report No. 12-06

2011*

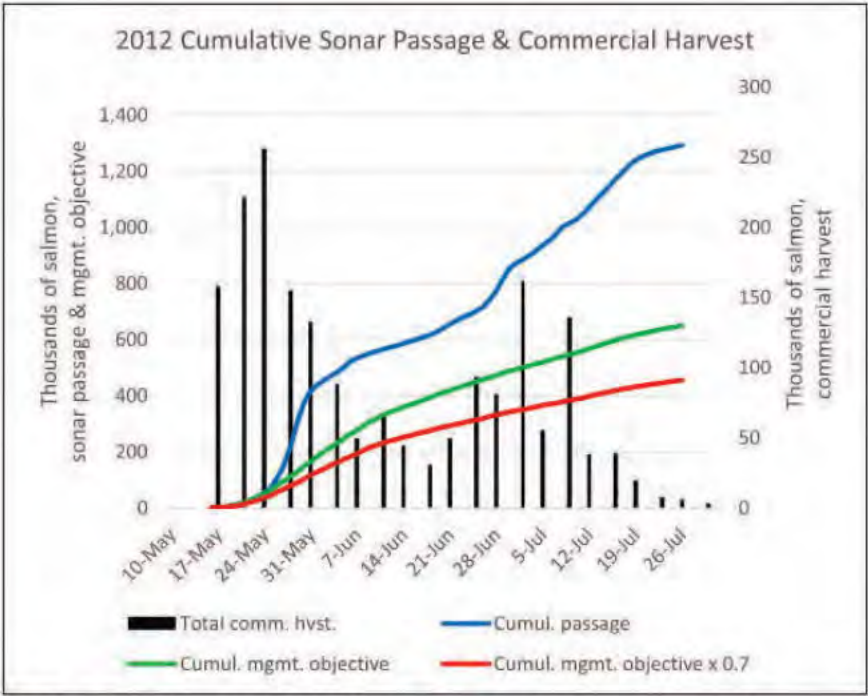
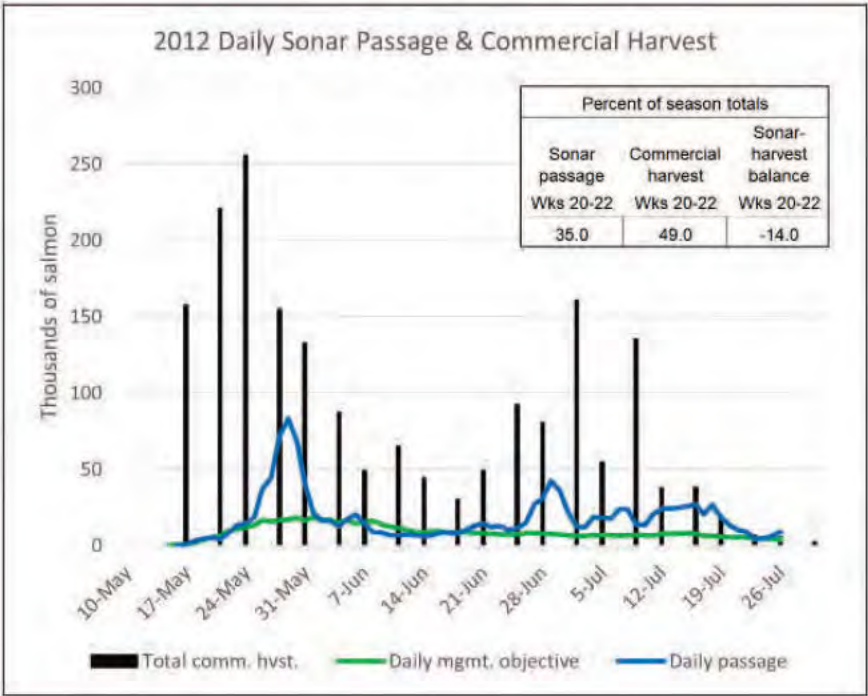
Note
different
y-axis



Data from Botz et al. 2013, Fishery Management Report No. 13-11

2012

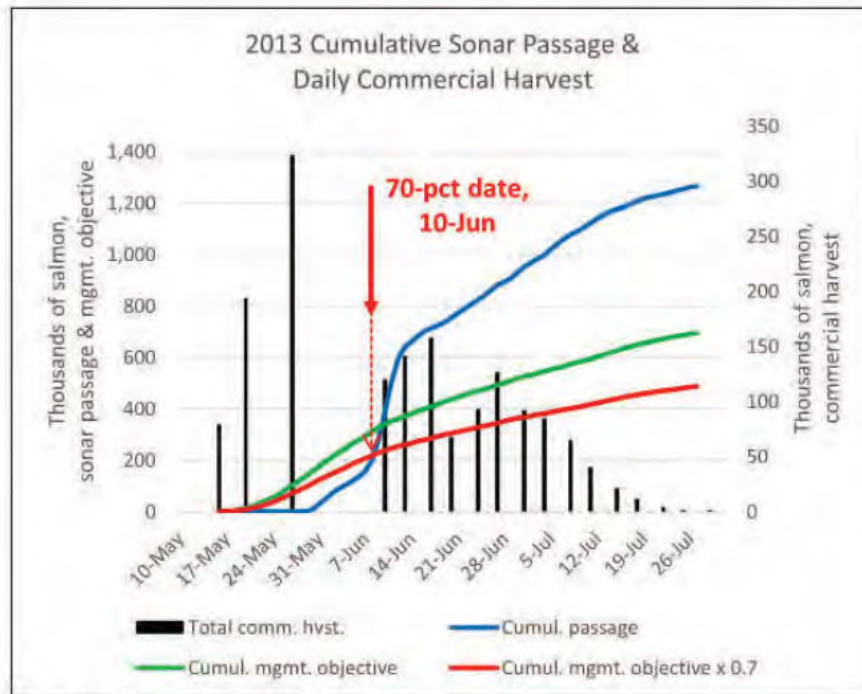
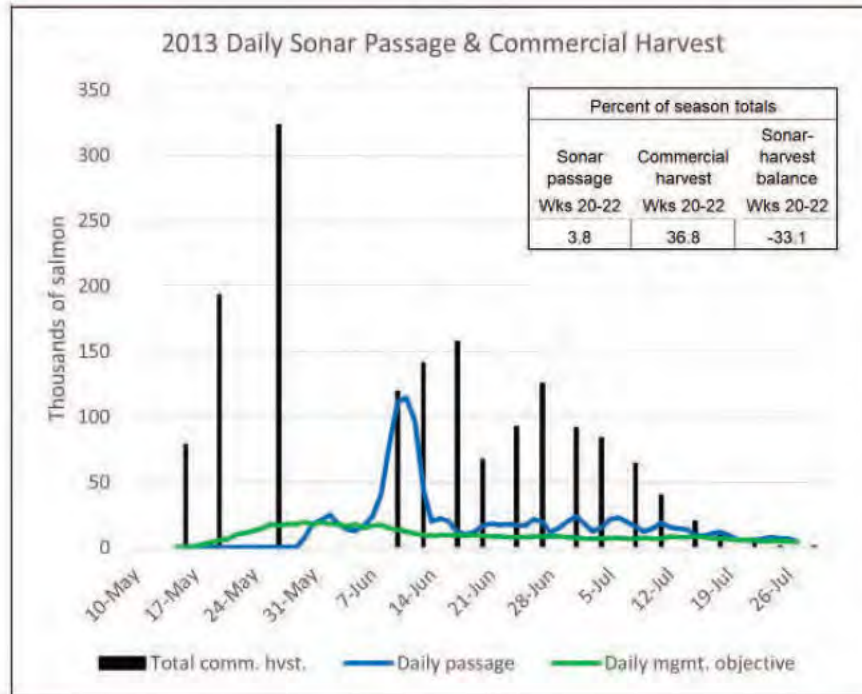
Note
different
y-axis



Data from Sheridan et al. 2013, Fishery Management Report No. 13-46

2013**

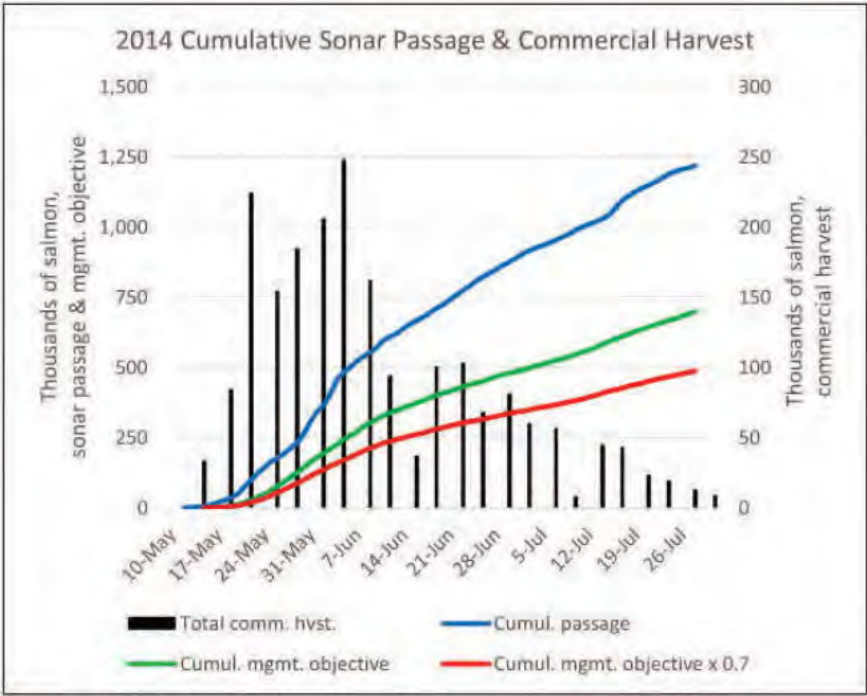
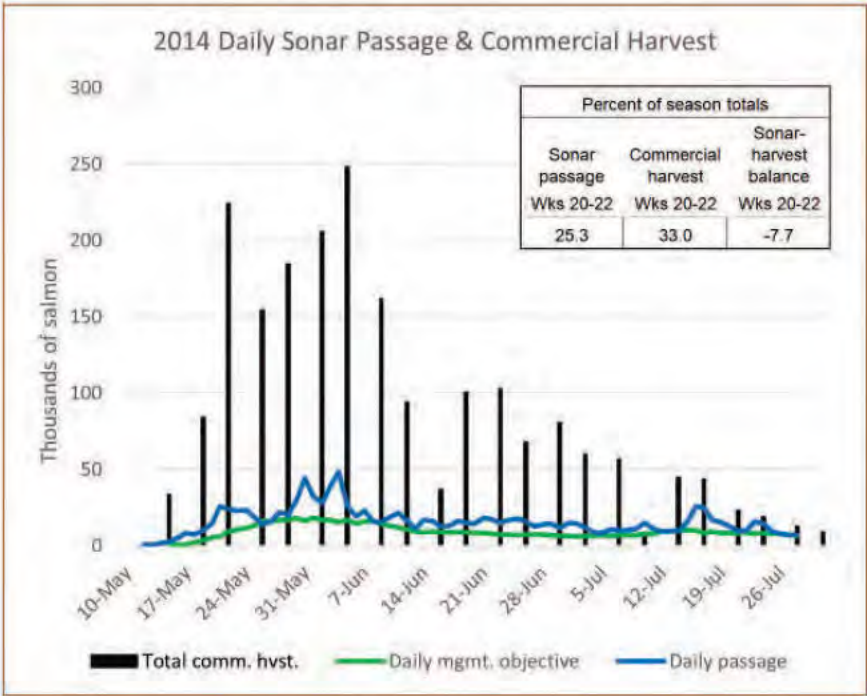
Note
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y-axis



Data from Botz et al. 2014, Fishery Management Report No. 14-43

2014

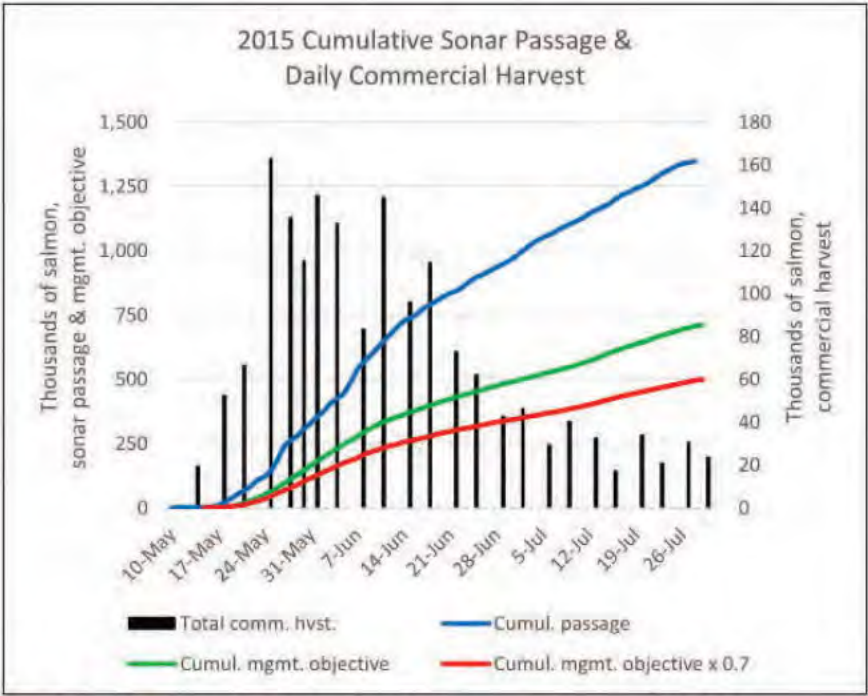
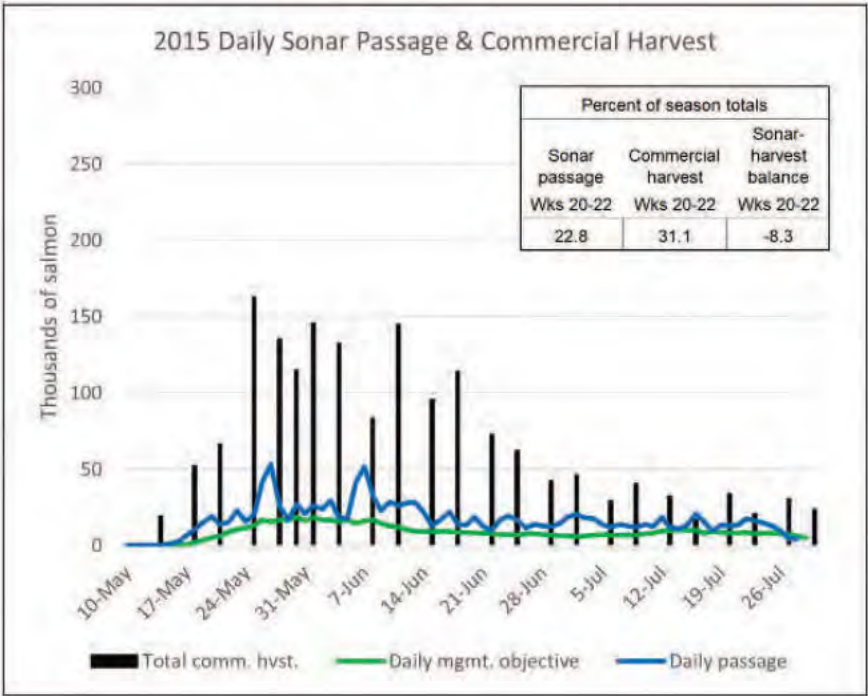
Note
different
y-axis



Data from Wiese et al. 2015, Fishery Management Report No. 15-34

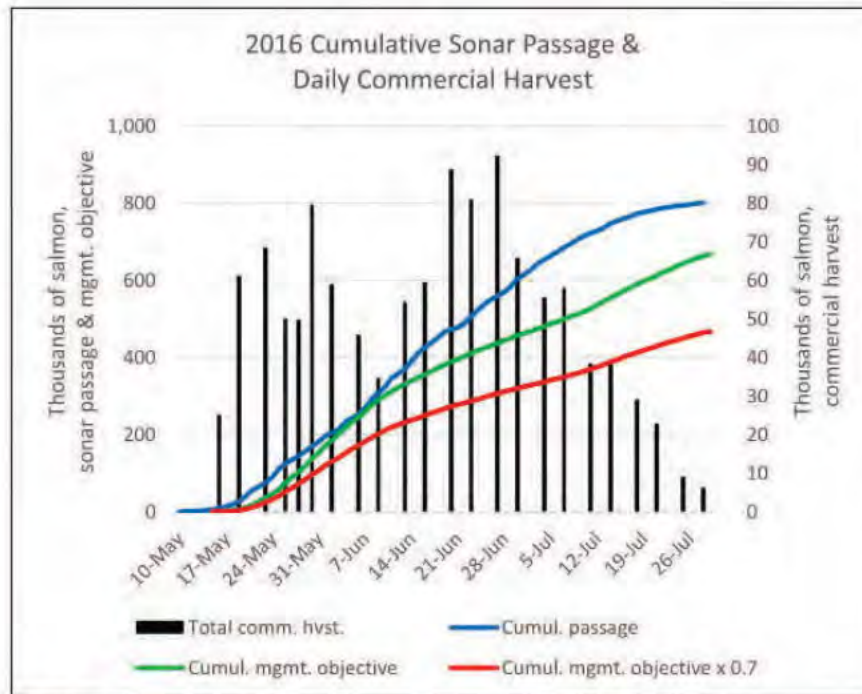
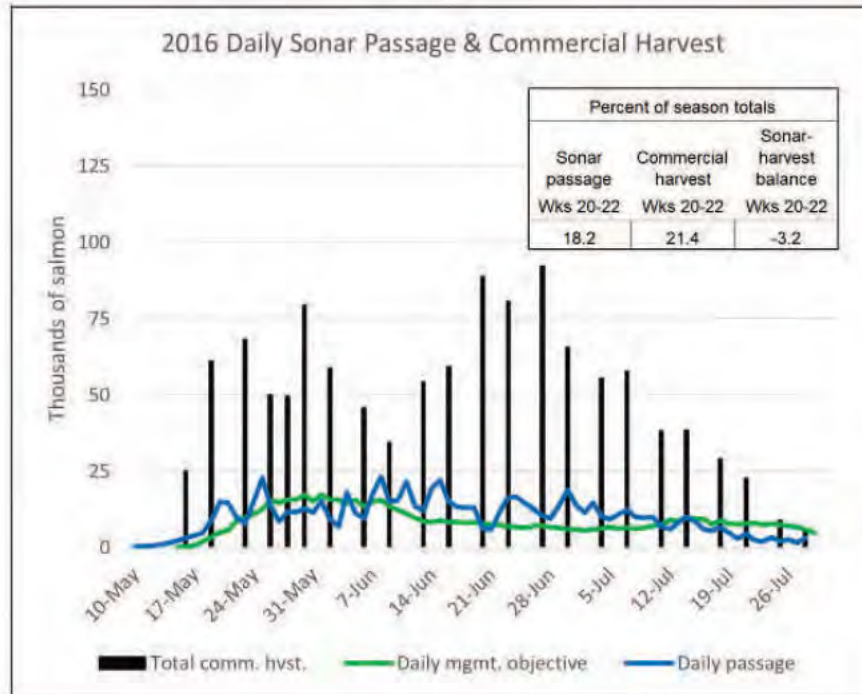
2015

Note
different
y-axis



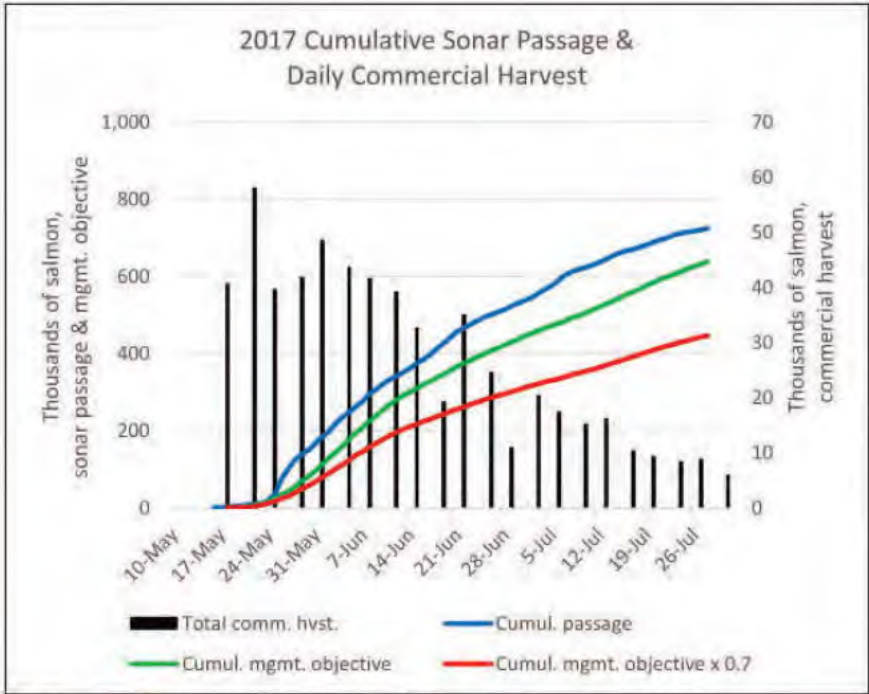
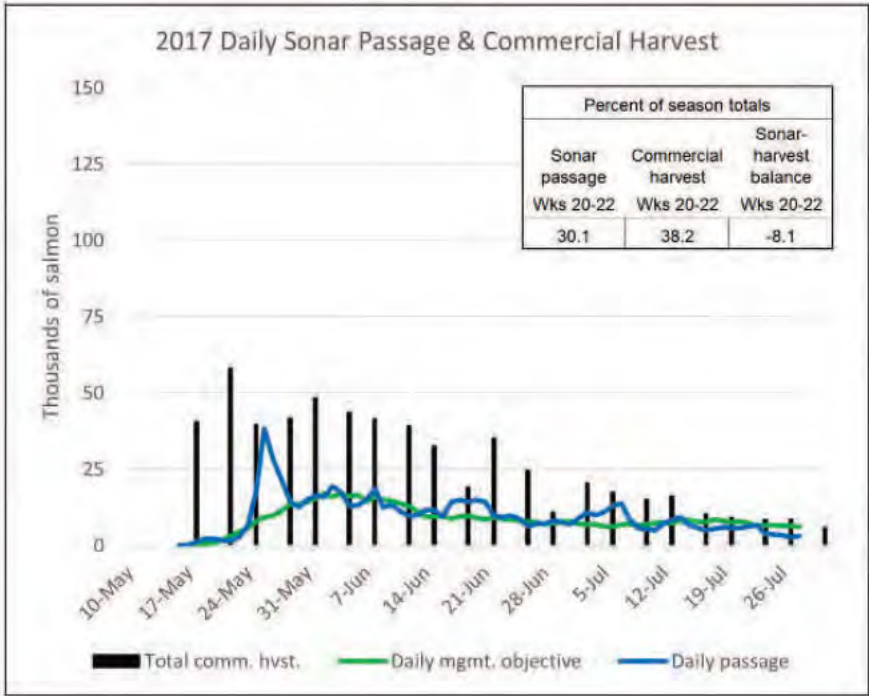
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2016



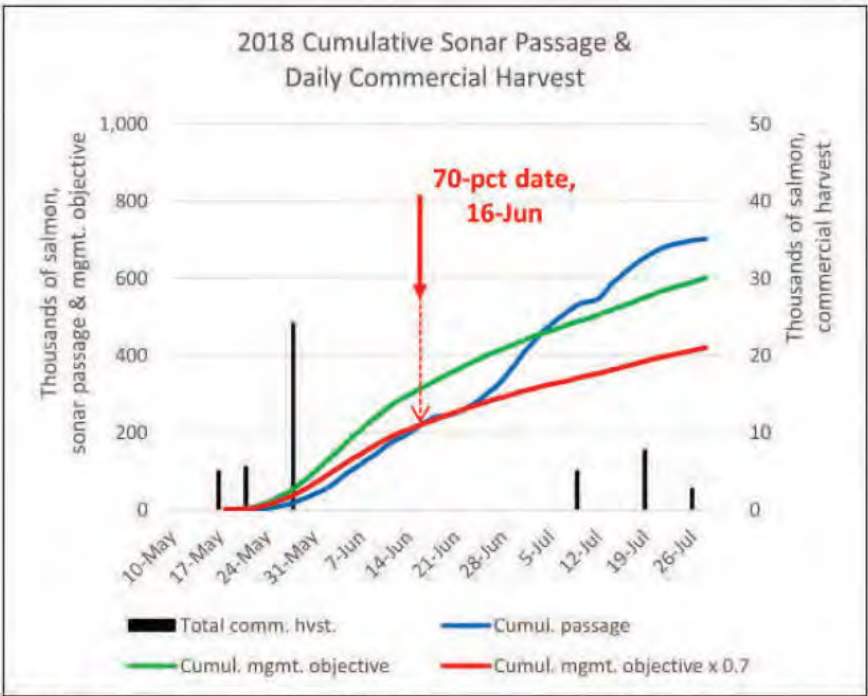
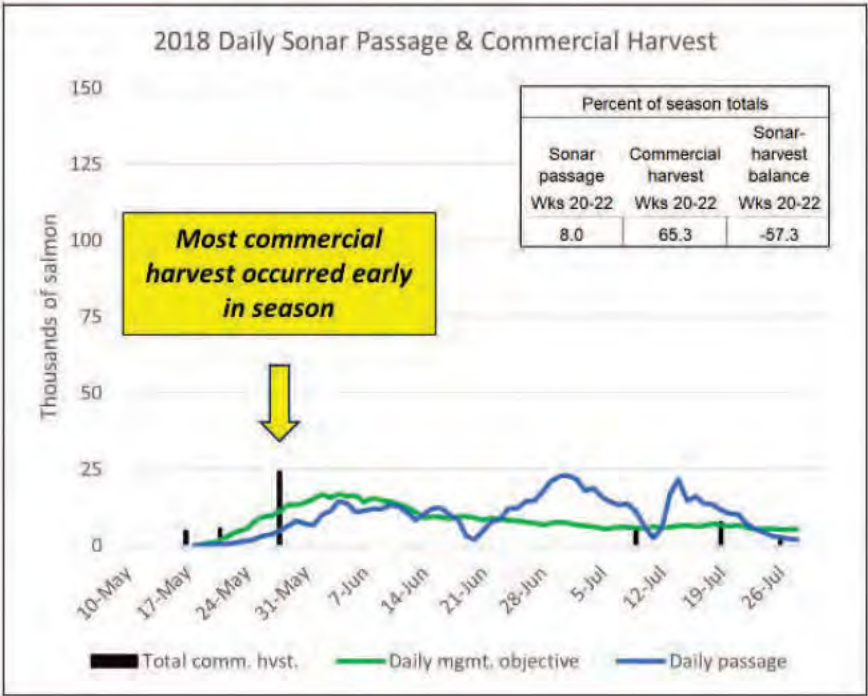
Data from Russell et al. 2017, Fishery Management Report No. 17-37

2017



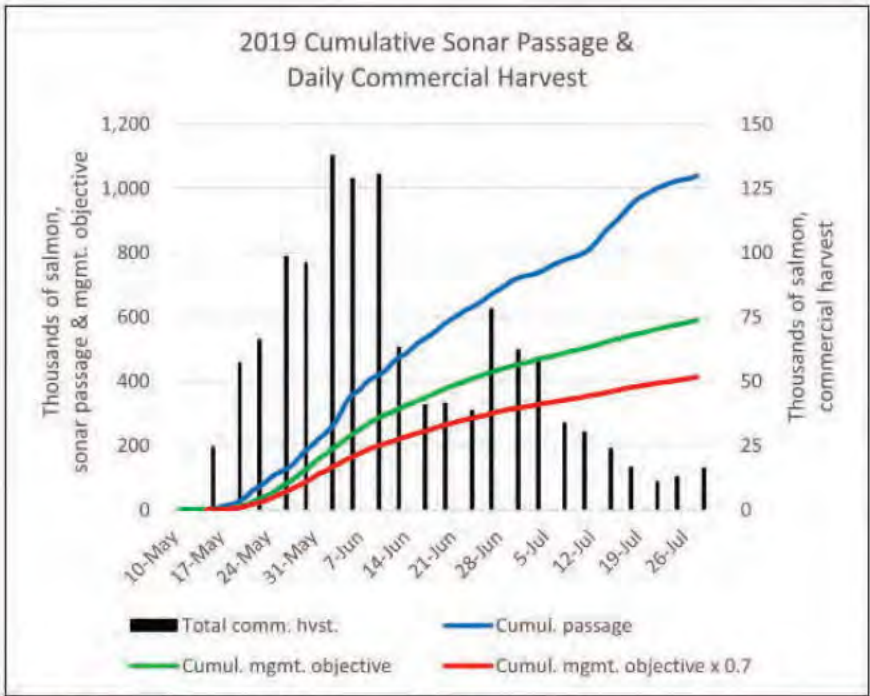
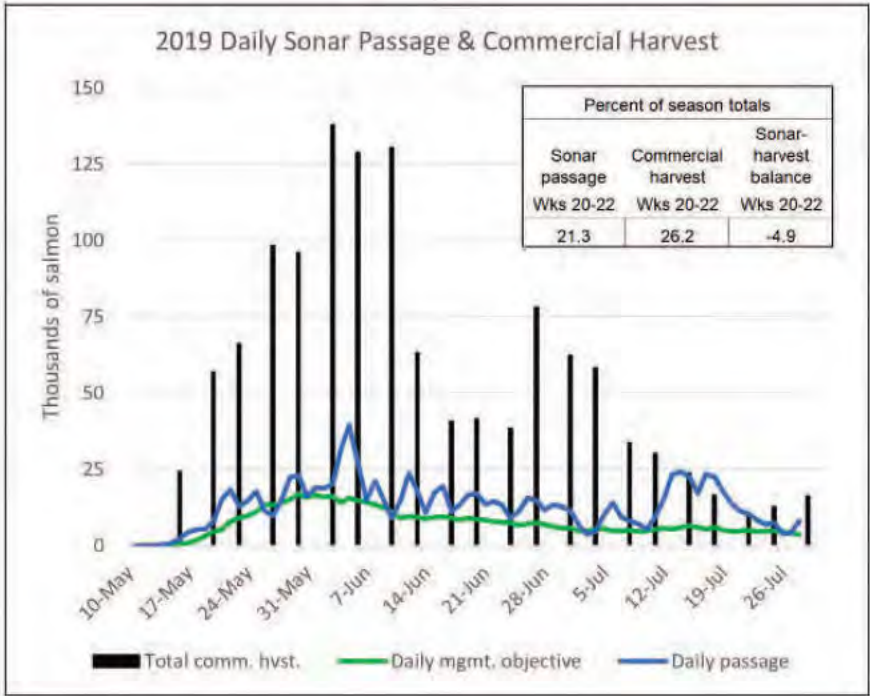
Data from Vega et al. 2019, Fishery Management Report No. 19-07

2018**



Data from Russell et al. 2021, Fishery Management Report No. 21-20

2019



Data from Morella et al. 2021, Fishery Management Report No. 21-19

2020**

**Low Chinook
salmon run**

Escapement goal
24,000 salmon

Escapement estimate
21,587 salmon

COINCIDED WITH

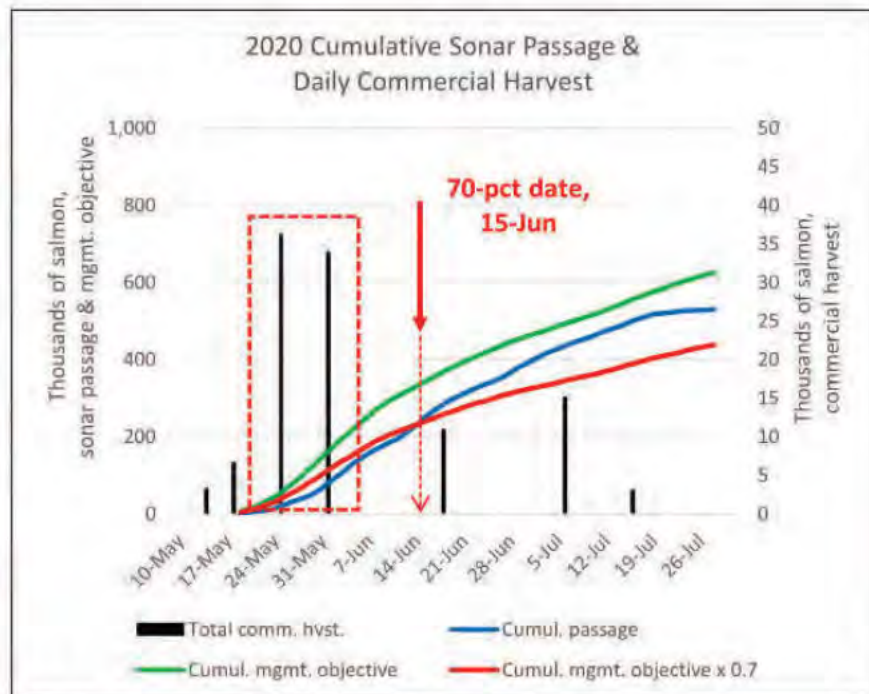
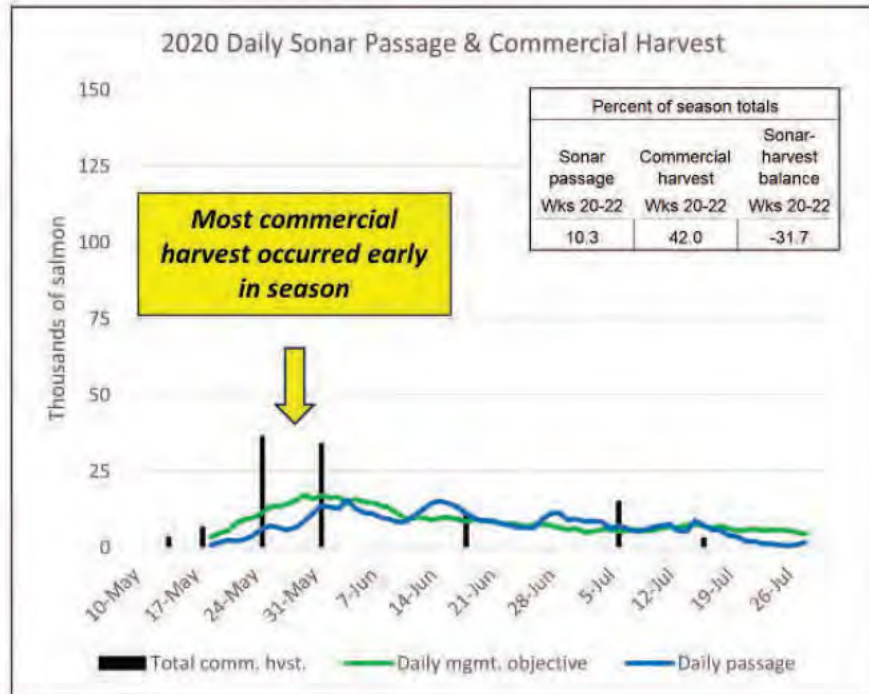
**Low sockeye
salmon run**

Escapement goal
360,000

Escapement estimate
362,445 salmon

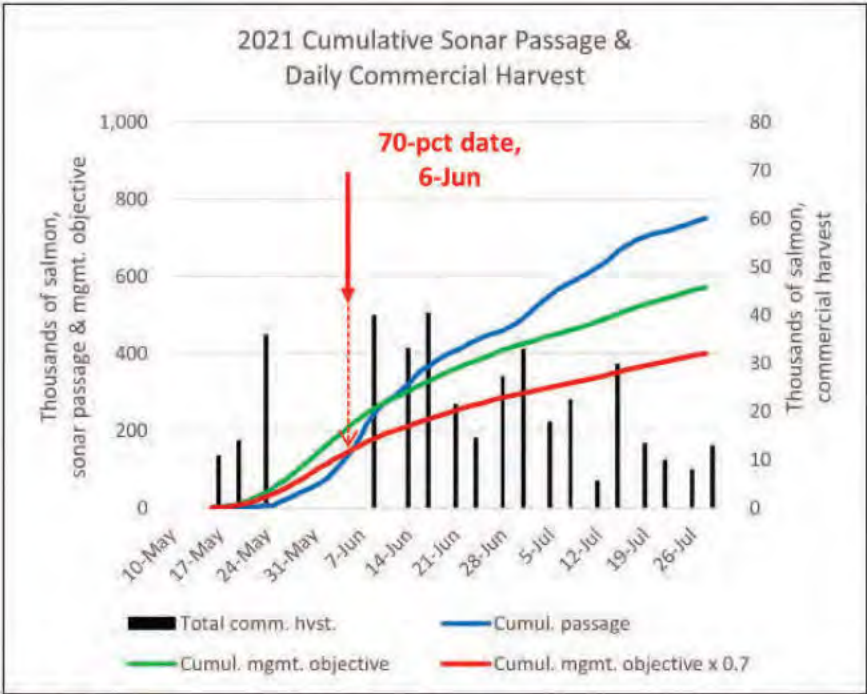
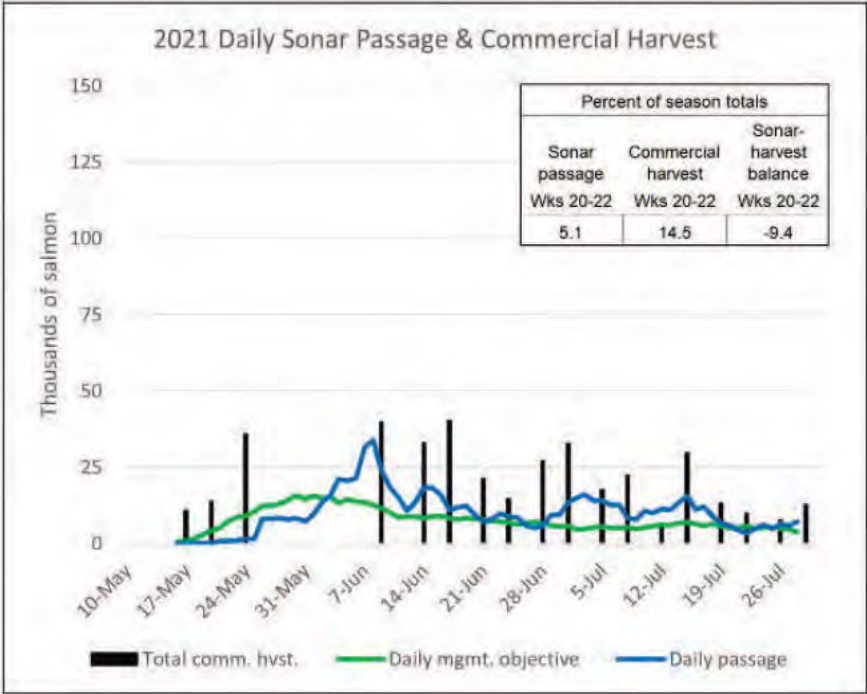
**Proposed 70-pct
threshold was not met
until 15-Jun.**

**If proposed regulation
was in effect, two open
fishing periods would
not have occurred,
2422 Chinook would
not have been
harvested, and
escapement goal likely
would have been met;
67,635 sockeye would
not have been
harvested, adding
significantly to the slim
margin by which the
escapement goal was
surpassed.**



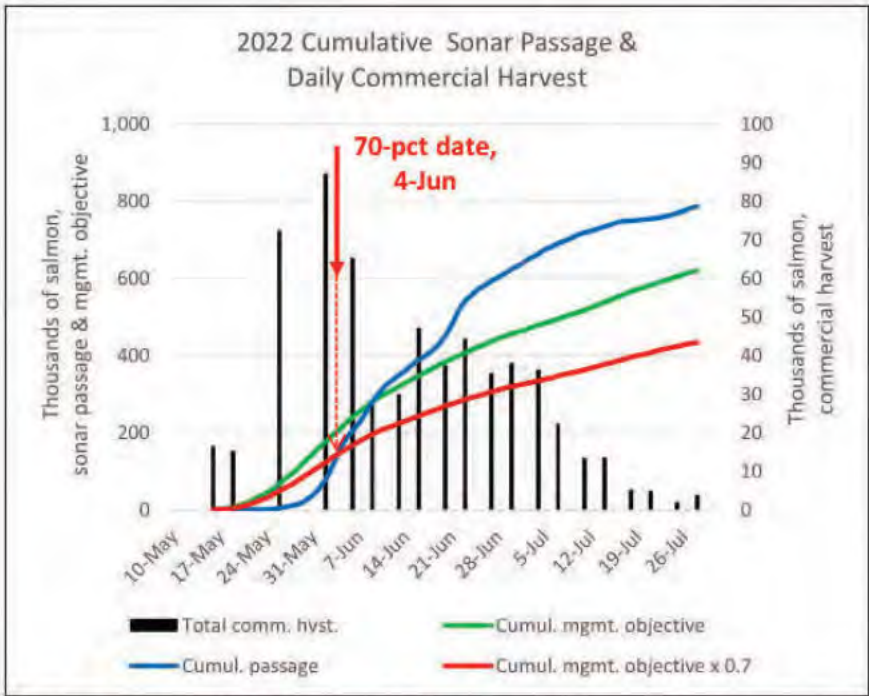
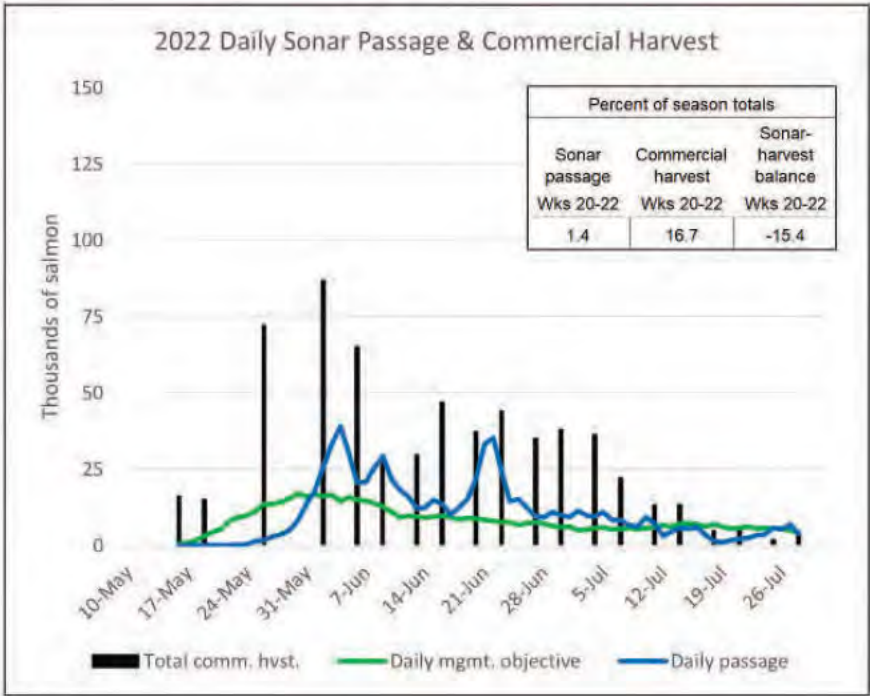
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2021**



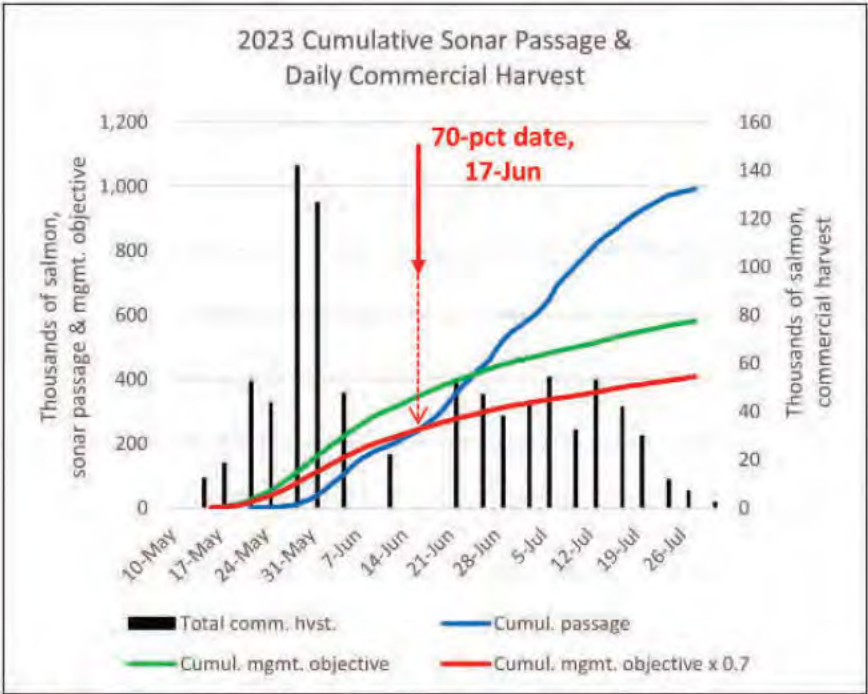
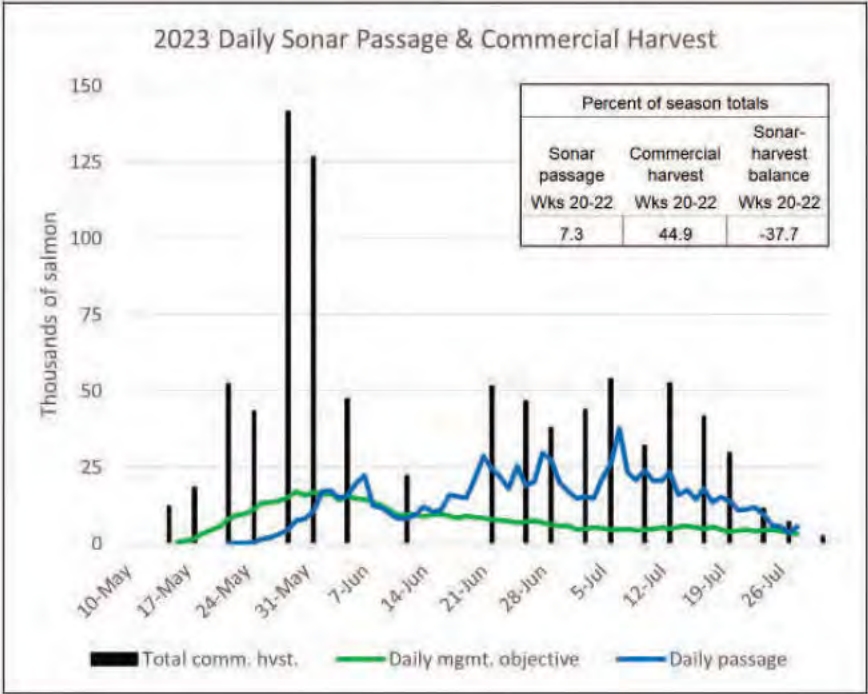
Data from Scannell et al. 2023, Fishery Management Report No. 23-06

2022**



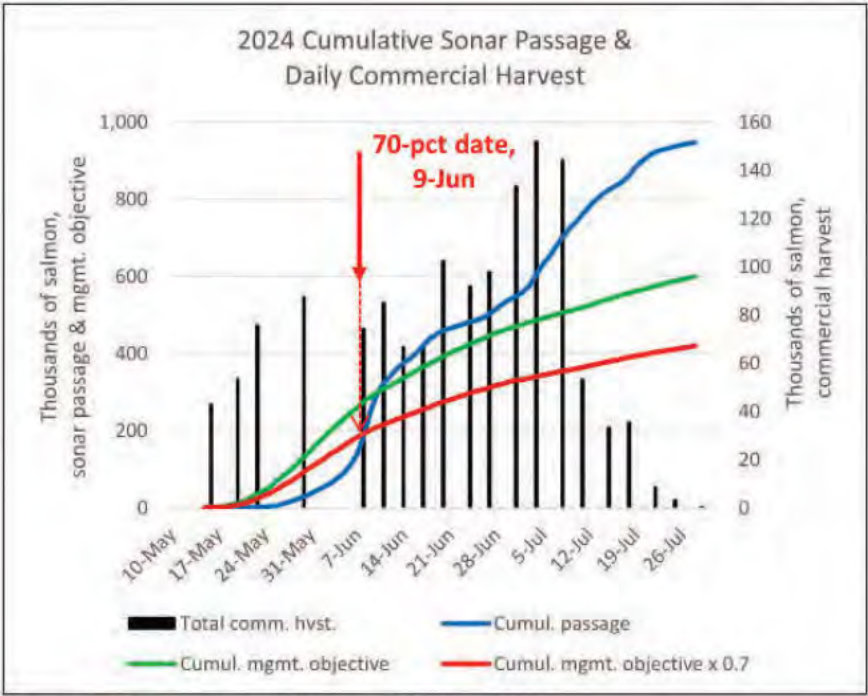
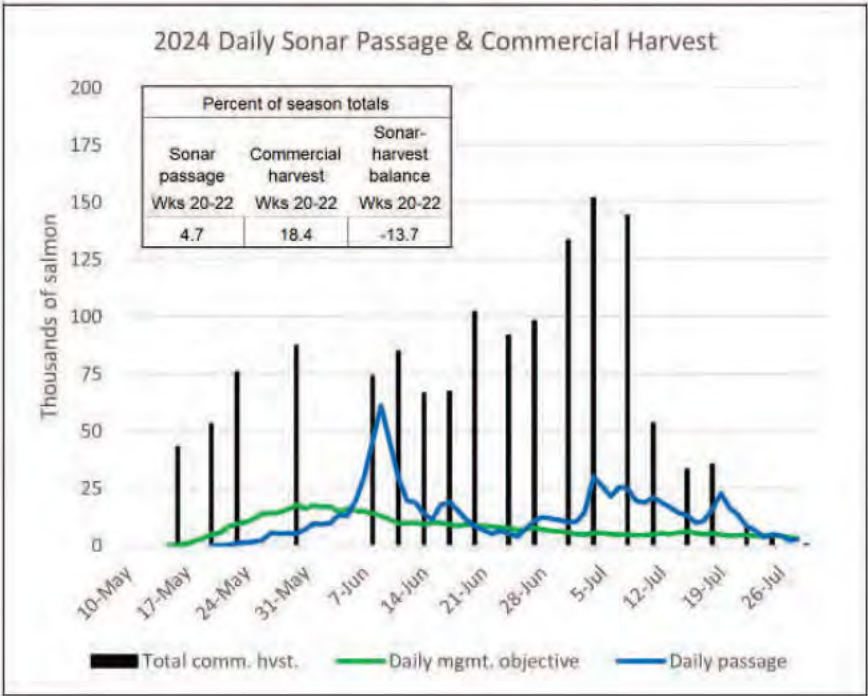
Data from Olson et al. 2023, Fishery Management Report No. 23-13

2023**



Data from Botz et al. 2024, Fishery Management Report No. 24-15

2024**



From preliminary inseason data provided by ADF&G

Attachment E – Tables summarizing and comparing observed sonar passage with management objectives for sonar passage (“sonar balance”), commercial harvest, and the balance between observed sonar passage and commercial harvest (“sonar-harvest balance”) for statistical weeks 20-31 (early-mid. May through the end of July) for years 2003-2024.

Sonar Balance

Table E1a. Miles Lake sonar balance¹ by statistical week (StatWk) and year, 2003-2024.

Year	May		June		July		StatWk30	StatWk31	Total				
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25				StatWk26	StatWk27	StatWk28	StatWk29
2003	3,594	21,023	25,404	7,317	27,283	13,343	23,184	8,633	-19,479	-54,243	26,503	15,532	98,094
2004	470	10,890	95,319	19,883	-10,834	7,020	21,995	9,046	9,074	-13,098	-23,315	666	127,116
2005	4,871	29,888	67,356	29,293	-5,062	16,054	44,027	51,601	12,136	-14,334	15,215	30,955	282,000
2006	-9,775	-58,149	164,226	45,253	33,872	47,494	20,004	15,783	10,979	24,653	37,038	12,087	343,465
2007	-5,932	-53,482	75,786	46,828	40,568	6,988	62,044	94,882	26,503	2,808	22,238	19,629	338,860
2008	-752	-14,301	-36,878	32,521	588	-8,551	4,379	82,067	35,703	12,035	4,766	5,644	117,221
2009	0	14,218	17,302	-43,326	-22,494	41,815	10,086	25,616	12,234	20,949	41,088	16,431	133,919
2010	0	-16,663	-42,547	37,363	21,265	1,199	-7,179	30,199	100,934	91,227	27,691	38,468	281,957
2011	0	-7,950	111,560	8,138	-24,450	-12,475	-47	19,081	72,538	73,505	66,354	14,618	320,872
2012	1,109	26,896	226,698	-10,397	-20,001	20,885	119,542	78,414	95,147	96,740	9,911	0	644,944
2013	-3,458	-64,328	-78,588	33,266	405,890	42,310	62,879	84,466	59,825	20,026	9,462	0	571,750
2014	16,861	79,161	51,769	102,310	31,279	44,452	57,018	38,869	25,493	52,075	22,184	148	521,619
2015	2,828	65,482	92,286	62,831	125,603	57,908	47,995	68,180	40,678	34,114	43,937	-2,533	639,309
2016	3,707	35,459	2,124	-25,981	16,649	48,032	33,692	45,489	33,377	-5,377	-26,262	-22,670	138,239
2017	4,269	54,930	14,535	-6,881	3,180	23,517	-1,917	28,492	-4,162	-15,166	-15,530	0	85,267
2018	-390	-24,040	-46,912	-23,502	684	-17,630	61,840	80,757	35,811	44,664	-10,801	0	100,481
2019	9,638	41,088	12,136	68,613	38,807	45,411	39,995	26,914	42,172	102,450	19,364	4,485	451,073
2020	0	-20,953	-50,220	-20,341	-10,756	23,135	-875	24,670	4,588	-2,902	-26,200	-11,409	-91,263
2021	0	-20,016	-43,456	-7,681	75,860	41,556	7,668	34,091	43,520	41,038	1,775	5,200	179,555
2022	0	-15,998	-69,000	30,132	74,975	26,649	102,764	27,221	20,695	-4,892	-26,613	-385	165,548
2023	-10,950	-66,500	-43,331	10,383	10,210	87,158	113,268	120,096	107,877	64,306	18,129	0	410,646
2024	-3,228	-48,931	-69,303	34,498	127,135	21,036	7,151	87,148	111,778	67,185	14,897	0	349,366
Average	584.6	-1,467.1	21,648.5	19,569.1	42,738.7	26,241.2	37,705.1	49,168.9	39,882.8	28,989.2	11,446.9	5,766.6	282,274.5

¹ Sonar balance calculated as observed daily sonar passage minus objective sonar passage for the same day, summed by statistical week. ADF&G data, compiled from annual Prince William Sound Area fish management reports.

Sonar Balance

Table E1b. Miles Lake sonar balance¹ by statistical week (StatWk) and year, 2003-2024. Green-to-red color ramp reflects variation among weeks for a single year, with red indicating the degree of deficit balance in sonar passage (observed less than objective sonar passage) and green indicating degree of surplus balance in sonar passage (observed greater than objective sonar passage).

Year	May			June			July			Season total			
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25	StatWk26	StatWk27	StatWk28		StatWk29	StatWk30	StatWk31
2003	3,594	21,023	25,404	7,317	27,283	13,343	23,184	8,633	-19,479	-54,243	26,503	15,532	98,094
2004	470	10,890	95,319	19,883	-10,834	7,020	21,995	9,046	9,074	-13,098	-23,315	666	127,116
2005	4,871	29,888	67,356	29,293	-5,062	16,054	44,027	51,601	12,136	-14,334	15,215	30,955	282,000
2006	-9,775	-58,149	164,226	45,253	33,872	47,494	20,004	15,783	10,979	24,653	37,038	12,087	343,465
2007	-5,932	-53,482	75,786	46,828	40,568	6,988	62,044	94,882	26,503	2,808	22,238	19,629	338,860
2008	-752	-14,301	-36,878	32,521	588	-8,551	4,379	82,067	35,703	12,035	4,766	5,644	117,221
2009	0	14,218	17,302	-43,326	-22,494	41,815	10,086	25,616	12,234	20,949	41,088	16,431	133,919
2010	0	-16,663	-42,547	37,363	21,265	1,199	-7,179	30,199	100,934	91,227	27,691	38,468	281,957
2011	0	-7,950	111,560	8,138	-24,450	-12,475	-47	19,081	72,538	73,505	66,354	14,618	320,872
2012	1,109	26,896	226,698	-10,397	-20,001	20,885	119,542	78,414	95,147	96,740	9,911	0	644,944
2013	-3,458	-64,328	-78,588	33,266	405,890	42,310	62,879	84,466	59,825	20,026	9,462	0	571,750
2014	16,861	79,161	51,769	102,310	31,279	44,452	57,018	38,869	25,493	52,075	22,184	148	521,619
2015	2,828	65,482	92,286	62,831	125,603	57,908	47,995	68,180	40,678	34,114	43,937	-2,533	639,309
2016	3,707	35,459	2,124	-25,981	16,649	48,032	33,692	45,489	33,377	-5,377	-26,262	-22,670	138,239
2017	4,269	54,930	14,535	-6,881	3,180	23,517	-1,917	28,492	-4,162	-15,166	-15,530	0	85,267
2018	-390	-24,040	-46,912	-23,502	684	-17,630	61,840	80,757	35,811	44,664	-10,801	0	100,481
2019	9,638	41,088	12,136	68,613	38,807	45,411	39,995	26,914	42,172	102,450	19,364	4,485	451,073
2020	0	-20,953	-50,220	-20,341	-10,756	23,135	-875	24,670	4,588	-2,902	-26,200	-11,409	-91,263
2021	0	-20,016	-43,456	-7,681	75,860	41,556	7,668	34,091	43,520	41,038	1,775	5,200	179,555
2022	0	-15,998	-69,000	30,132	74,975	26,649	102,764	27,221	20,695	-4,892	-26,613	-385	165,548
2023	-10,950	-66,500	-43,331	10,383	10,210	87,158	113,268	120,096	107,877	64,306	18,129	0	410,646
2024	-3,228	-48,931	-69,303	34,498	127,135	21,036	7,151	87,148	111,778	67,185	14,897	0	349,366
Average	584.6	-1,467.1	21,648.5	19,569.1	42,738.7	26,241.2	37,705.1	49,168.9	39,882.8	28,989.2	11,446.9	5,766.6	282,274.5

¹ Sonar balance calculated as observed daily sonar passage minus objective sonar passage for the same day, summed by statistical week. ADF&G data, compiled from annual Prince William Sound Area finfish management reports.



Stat week 22 -> note significant declining trend in sonar balance

Commercial Harvest

Table E2a. Copper River District commercial fishery harvest (sockeye + Chinook) by statistical week (StatWk) and year, 2003-2024¹.

Year	May		June				July				StatWk31	Total	
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25	StatWk26	StatWk27	StatWk28	StatWk29			StatWk30
2003	36,571	132,425	158,335	138,088	114,278	94,801	84,208	148,351	134,438	115,793	43,363	17,094	1,217,745
2004	0	102,217	114,818	221,813	112,158	117,760	107,274	106,666	87,742	78,346	21,294	4,785	1,074,873
2005	0	156,555	247,667	249,627	129,280	87,417	142,002	82,011	83,533	69,503	49,684	22,089	1,319,368
2006	112,821	110,924	259,304	126,728	141,455	200,396	150,028	116,785	107,467	65,012	36,304	28,870	1,456,094
2007	100,950	112,750	488,055	166,677	266,399	242,115	97,645	135,050	82,392	86,896	73,956	61,616	1,914,501
2008	3,234	73,861	51,536	90,633	48,048	27,378	0	9,637	13,539	9,026	3,457	1,574	331,923
2009	22,067	192,320	209,971	104,327	39,695	72,751	30,921	51,715	71,981	72,611	12,869	14,805	896,033
2010	7,610	85,186	80,357	0	65,931	38,965	35,062	42,167	76,412	124,336	59,263	23,281	638,570
2011	0	219,768	409,584	222,100	153,300	90,583	119,224	290,058	295,355	137,142	95,886	28,238	2,061,238
2012	157,488	476,236	286,705	136,148	108,866	79,206	172,791	215,350	173,153	57,072	12,077	2,468	1,877,560
2013	78,717	192,936	323,256	0	260,182	224,185	218,143	174,886	104,164	30,921	4,940	1,749	1,614,079
2014	33,275	307,921	338,483	453,315	255,571	137,215	170,543	140,669	64,058	87,617	42,010	21,104	2,051,781
2015	19,381	118,669	413,102	278,035	228,000	210,127	134,591	88,881	69,200	49,510	54,268	53,968	1,717,732
2016	0	85,891	167,616	138,047	80,070	113,457	169,248	157,704	113,253	76,499	51,461	14,897	1,168,143
2017	40,556	97,571	90,175	85,074	71,700	54,181	35,428	37,700	31,204	19,468	17,030	9,699	589,786
2018	4,983	5,542	24,164	0	0	0	0	0	4,969	7,694	2,788	629	50,769
2019	24,334	122,821	194,293	266,441	193,470	82,242	116,461	120,240	63,828	40,153	23,400	28,891	1,276,574
2020	3,220	6,593	36,205	33,852	0	10,853	0	0	15,068	3,064	0	0	108,855
2021	0	24,557	35,734	0	39,842	73,196	35,691	59,842	40,097	35,204	22,931	20,465	387,559
2022	0	31,249	72,112	86,868	93,374	76,744	81,390	72,985	58,392	26,435	9,737	5,459	614,745
2023	30,550	95,641	268,121	47,350	22,068	51,532	84,638	97,772	84,630	71,451	18,708	3,974	876,435
2024	42,965	128,807	87,464	74,293	151,651	169,466	189,803	285,436	197,647	68,647	11,588	780	1,408,547
Average	32,669.2	130,929.1	198,048.0	132,700.7	117,060.8	102,480.5	98,867.8	110,632.0	89,660.1	60,563.6	30,318.8	16,656.1	1,120,586.8

¹ ADF&G data, compiled from annual Prince William Sound Area finfish management reports.

Commercial Harvest

Table E2b. Copper River District commercial fishery harvest (sockeye + Chinook) by statistical week (StatWk) and year, 2003-2024. **Green-to-red color ramp reflects variation among weeks for a single year, with red indicating low relative harvest and green indicating high relative harvest.**

Year	May			June			July			Total
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25	StatWk26	StatWk27	StatWk28	
2003	36,571	132,425	158,335	138,088	114,278	94,801	84,208	148,351	134,438	1,217,745
2004	0	102,217	114,818	221,813	112,158	117,760	107,274	106,666	87,742	1,074,873
2005	0	156,555	247,667	249,627	129,280	87,417	142,002	82,011	83,533	1,319,368
2006	112,821	110,924	259,304	126,728	141,455	200,396	150,028	116,785	107,467	1,456,094
2007	100,950	112,750	488,055	166,677	266,399	242,115	97,645	135,050	82,392	1,914,501
2008	3,234	73,861	51,536	90,633	48,048	27,378	0	9,637	13,539	331,923
2009	22,067	192,320	209,971	104,327	39,695	72,751	30,921	51,715	71,981	896,033
2010	7,610	85,186	80,357	0	65,931	38,965	35,062	42,167	76,412	638,570
2011	0	219,768	409,584	222,100	153,300	90,583	119,224	290,058	295,355	2,061,238
2012	157,488	476,236	286,705	136,148	108,866	79,206	172,791	215,350	173,153	1,877,560
2013	78,717	192,936	323,256	0	260,182	224,185	218,143	174,886	104,164	1,614,079
2014	33,275	307,921	338,483	453,315	255,571	137,215	170,543	140,669	64,058	2,051,781
2015	19,381	118,669	413,102	278,035	228,000	210,127	134,591	88,881	69,200	1,717,732
2016	0	85,891	167,616	138,047	80,070	113,457	169,248	157,704	113,253	1,168,143
2017	40,556	97,571	90,175	85,074	71,700	54,181	35,428	37,700	31,204	589,786
2018	4,983	5,542	24,164	0	0	0	0	0	4,969	50,769
2019	24,334	122,821	194,293	266,441	193,470	82,242	116,461	120,240	63,828	1,276,574
2020	3,220	6,593	36,205	33,852	0	10,853	0	0	3,064	108,855
2021	0	24,557	35,734	0	39,842	73,196	35,691	59,842	40,097	387,559
2022	0	31,249	72,112	86,868	93,374	76,744	81,390	72,985	58,392	614,745
2023	30,550	95,641	268,121	47,350	22,068	51,532	84,638	97,772	84,630	876,435
2024	42,965	128,807	87,464	74,293	151,651	169,466	189,803	197,647	68,647	1,408,547
Average	32,669.2	130,929.1	198,048.0	132,700.7	117,060.8	102,480.5	98,867.8	110,632.0	89,660.1	1,120,586.8

¹ ADF&G data, compiled from annual Prince William Sound Area fishery management reports.



Stat week 22 -> annually, maximum commercial harvest tends to occur during this week

Sonar-Harvest Balance (counts)

Table E3a. Balance between Miles Lake sonar passage and Copper River District commercial harvest ("sonar-harvest balance," calculated as passage counts - harvest counts) by statistical week (StatWk) and year, 2003-2024.

Year	May		June				July				StatWk30	StatWk31	Total
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25	StatWk26	StatWk27	StatWk28	StatWk29			
2003	-32,578	-97,222	-85,475	-47,100	-1,806	-21,336	-10,835	-83,527	-82,149	-99,004	27,077	16,828	-517,127
2004	470	-83,401	21,145	-119,069	-24,779	-40,252	-34,378	-55,931	-32,125	-44,868	-6,388	14,349	-405,227
2005	4,871	-120,545	-142,420	-142,239	-28,796	7,910	-43,205	13,810	-23,969	-33,347	8,246	29,557	-470,127
2006	-112,437	-100,224	3,326	4,098	-53,003	-104,770	-79,578	-49,005	-34,551	9,788	31,424	-11,474	-496,406
2007	-100,950	-103,622	-311,006	-27,836	-166,813	-186,117	9,249	-2,250	-15,924	-47,874	-26,462	-35,954	-1,015,559
2008	-2,958	-44,017	13,750	43,339	25,670	18,447	52,389	115,253	64,549	46,986	31,757	21,256	386,421
2009	-22,067	-145,809	-98,021	-49,446	14,132	21,786	25,602	16,156	-19,994	-7,485	58,984	19,877	-186,285
2010	-7,610	-81,508	-23,557	152,332	46,606	22,138	10,471	37,166	69,500	16,686	4,985	38,032	285,241
2011	0	-210,970	-212,262	-106,703	-86,872	-46,110	-70,191	-225,226	-180,937	-17,270	4,507	967	-1,151,067
2012	-149,431	-375,987	58,642	-38,728	-59,665	-680	-65	-91,026	-28,868	84,096	21,020	-2,468	-583,160
2013	-78,717	-192,928	-275,620	150,940	224,742	-118,862	-98,501	-40,763	6,677	38,808	38,954	-1,749	-347,019
2014	-15,345	-181,390	-174,635	-238,255	-141,117	-32,840	-62,984	-56,839	12,496	29,124	36,164	-7,742	-833,363
2015	-16,131	-16,032	-211,473	-100,411	-10,866	-90,684	-34,173	25,005	20,644	51,001	46,997	-35,509	-371,632
2016	3,707	-33,675	-77,664	-52,787	33,241	-5,315	-84,503	-67,402	-35,985	-20,986	-22,797	-2,477	-366,643
2017	-34,972	-556	24,981	17,655	6,233	32,631	16,230	38,049	16,337	20,369	6,382	-9,699	133,640
2018	-4,798	3,228	22,721	85,796	79,921	45,184	114,808	124,438	72,815	82,995	24,329	-629	650,808
2019	-11,615	-30,805	-77,646	-93,851	-85,332	23,540	-27,573	-56,864	13,923	101,254	28,534	-20,881	-237,316
2020	-3,220	3,095	8,692	56,820	70,452	76,325	52,800	66,487	29,573	42,423	14,690	3,321	421,458
2021	0	-22,240	613	95,983	115,235	27,790	22,086	14,195	39,800	49,286	17,409	3,546	363,703
2022	0	-30,965	-61,699	55,470	73,856	15,030	77,654	-399	1,179	14,994	5,544	20,100	170,764
2023	-30,550	-91,612	-200,097	59,067	53,053	92,802	74,152	55,726	57,970	25,623	23,145	-3,974	115,305
2024	-42,965	-124,437	-47,630	68,540	47,533	-85,573	-131,983	-161,818	-52,213	34,745	31,822	1,800	-462,179
Average	-29,253.9	-93,199.3	-85,605.0	-14,044.0	4,004.4	-12,542.0	-4,311.7	-10,616.5	-2,335.2	16,314.2	17,833.4	1,679.9	-212,075.8

Sonar-Harvest Balance (counts)

Table E3b. Balance between Miles Lake sonar passage and Copper River District commercial harvest ("sonar-harvest balance," calculated as passage counts - harvest counts) by statistical week (StatWk) and year, 2003-2024. **Green-to-red color ramp reflects variation among statistical weeks for a single year. Red indicates degree to which harvest exceeds sonar passage and green indicates degree to which sonar passage exceeds commercial harvest.**

Year	May			June			July			StatWk31	Total		
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25	StatWk26	StatWk27	StatWk28			StatWk29	StatWk30
2003	-32,578	-97,222	-85,475	-47,100	-1,806	-21,336	-10,835	-83,527	-82,149	-99,004	27,077	16,828	-517,127
2004	470	-83,401	21,145	-119,069	-24,779	-40,252	-34,378	-55,931	-32,125	-44,868	-6,388	14,349	-405,227
2005	4,871	-120,545	-142,420	-142,239	-28,796	7,910	-43,205	13,810	-23,969	-33,347	8,246	29,557	-470,127
2006	-112,437	-100,224	3,326	4,098	-53,003	-104,770	-79,578	-49,005	-34,551	9,788	31,424	-11,474	-486,406
2007	-100,950	-103,622	-311,006	-27,836	-166,813	-186,117	9,249	-2,250	-15,924	-47,874	-26,462	-35,954	-1,015,559
2008	-2,958	-44,017	13,750	43,339	25,670	18,447	52,389	115,253	64,549	46,986	31,757	21,256	386,421
2009	-22,067	-145,809	-98,021	-49,446	14,132	21,786	25,602	16,156	-19,994	-7,485	58,984	19,877	-186,285
2010	-7,610	-81,508	-23,557	152,332	46,606	22,138	10,471	37,166	69,500	16,686	4,985	38,032	285,241
2011	0	-210,970	-212,262	-106,703	-86,872	-46,110	-70,191	-225,226	-180,937	-17,270	4,507	967	-1,151,067
2012	-149,431	-375,987	58,642	-38,728	-59,665	-680	-65	-91,026	-28,868	84,096	21,020	-2,468	-583,160
2013	-78,717	-192,928	-275,620	150,940	224,742	-118,862	-98,501	-40,763	6,677	38,808	38,954	-1,749	-347,019
2014	-15,345	-181,390	-174,635	-238,255	-141,117	-32,840	-62,984	-56,839	12,496	29,124	36,164	-7,742	-833,363
2015	-16,131	-16,032	-211,473	-100,411	-10,866	-90,684	-34,173	25,005	20,644	51,001	46,997	-35,509	-371,632
2016	3,707	-33,675	-77,664	-52,787	33,241	-5,315	-84,503	-67,402	-35,985	-20,986	-22,797	-2,477	-366,643
2017	-34,972	-556	24,981	17,655	6,233	32,631	16,230	38,049	16,337	20,369	6,382	-9,699	133,640
2018	-4,798	3,228	22,721	85,796	79,921	45,184	114,808	124,438	72,815	82,995	24,329	-629	650,808
2019	-11,615	-30,805	-77,646	-93,851	-85,332	23,540	-27,573	-56,864	13,923	101,254	28,534	-20,881	-237,316
2020	-3,220	3,095	8,692	56,820	70,452	76,325	52,800	66,487	29,573	42,423	14,690	3,321	421,458
2021	0	-22,240	613	95,983	115,235	27,790	22,086	14,195	39,800	49,286	17,409	3,546	363,703
2022	0	-30,965	-61,699	55,470	73,856	15,030	77,654	-399	1,179	14,994	5,544	20,100	170,764
2023	-30,550	-91,612	-200,097	59,067	53,053	92,802	74,152	55,726	57,970	25,623	23,145	-3,974	115,305
2024	-42,965	-124,437	-47,630	68,540	47,533	-85,573	-131,983	-161,818	-52,213	34,745	31,822	1,800	-462,179
Average	-29,253.9	-93,199.3	-85,605.0	-14,044.0	4,004.4	-12,542.0	-4,311.7	-10,616.5	-2,335.2	16,314.2	17,833.4	1,679.9	-212,075.8

Stat weeks 21-22 ->
greatest imbalance when
commercial harvest
exceeds sonar passage

Sonar-Harvest Balance (percents of season totals)

Table E4a. Balance between Miles Lake sonar passage and Copper River District commercial harvest ("sonar-harvest balance," calculated as passage percent of season total - harvest percent of season total) by statistical week (Stat Wk) and year, 2003-2024. **Sums for statistical weeks 20-22 are in bold font.**

Year	May		June		July		Sum Wks 20-22	Stat Wk 22	Stat Wk 21	Stat Wk 20	June		July		Stat Wk 29	Stat Wk 30	Stat Wk 31
	Stat Wk 20	Stat Wk 21	Stat Wk 22	Stat Wk 23	Stat Wk 24	Stat Wk 25	Stat Wk 26	Stat Wk 27	Stat Wk 28	Stat Wk 29	Stat Wk 28	Stat Wk 27	Stat Wk 26	Stat Wk 25	Stat Wk 24	Stat Wk 23	Stat Wk 22
2003	-2.4	-5.7	-2.4	1.8	6.8	2.8	3.7	-2.8	-3.4	-7.0	6.5	6.5	-7.0	-2.2	0.2	3.5	3.5
2004	0.1	-6.6	9.7	-5.1	2.7	0.7	1.0	-2.3	0.2	-2.2	0.3	2.4	-2.2	-0.9	0.8	2.4	2.4
2005	0.5	-7.3	-5.9	-5.8	2.2	4.7	1.1	5.2	0.8	-0.9	3.1	4.4	-0.9	3.5	4.7	4.4	4.4
2006	-7.4	-6.2	10.3	5.3	-0.1	-3.2	-2.5	-0.6	0.5	3.5	4.7	-0.1	-0.3	-0.3	0.5	4.7	-0.1
2007	-5.2	-4.8	-6.1	6.4	-3.0	-6.5	6.5	7.4	2.9	-0.3	1.3	2.6	-0.3	5.1	3.9	2.7	2.6
2008	-0.9	-18.1	-6.4	-8.6	-4.2	-19	7.3	14.5	6.8	5.1	3.9	2.7	5.1	1.2	-0.6	8.7	3.3
2009	-2.4	-14.7	-7.4	-3.8	3.2	5.3	4.5	3.8	-0.6	1.2	8.7	3.3	1.2	-4.0	-2.2	3.0	3.0
2010	-1.2	-12.8	-6.3	16.5	2.0	0.6	-0.5	2.0	3.9	-4.0	6.4	1.8	6.5	6.4	1.8	1.8	1.8
2011	0.0	-9.6	1.9	2.0	-0.1	0.5	-0.4	-6.9	-1.7	7.9	1.9	-0.1	7.9	1.9	1.9	-0.1	-0.1
2012	-7.8	-17.6	11.4	0.3	-2.0	1.8	4.1	-1.9	1.9	3.6	3.2	-0.1	3.6	3.2	3.2	-0.1	-0.1
2013	-4.9	-11.9	-16.2	11.9	22.2	-5.6	-4.1	-0.2	2.3	4.7	4.5	-1.7	4.7	4.5	-1.7	4.5	-1.7
2014	-0.1	-4.6	-3.0	-4.4	-3.0	1.9	0.5	0.1	3.2	5.3	4.4	0.1	5.3	4.4	4.4	0.1	0.1
2015	-0.9	0.9	-8.4	-2.5	3.2	-3.0	-0.1	3.4	2.8	4.7	4.5	-1.7	4.7	4.5	-1.7	4.5	-1.7
2016	0.5	-0.7	-2.9	-1.0	7.4	3.9	-3.7	-2.0	0.1	0.5	-0.8	0.3	0.5	-0.8	0.3	0.3	0.3
2017	-6.0	-2.9	0.8	0.0	-1.2	2.9	1.2	4.2	1.3	2.2	0.4	-1.6	2.2	0.4	-1.6	0.4	-1.6
2018	-9.3	-9.2	-38.8	12.2	11.4	6.4	16.4	17.7	1.7	-1.6	-1.4	-1.2	-1.6	-1.4	-1.4	-1.2	-1.2
2019	-0.6	-0.6	-3.7	-3.9	-4.5	3.9	-0.4	-3.1	2.6	10.5	3.2	-1.4	10.5	3.2	3.2	-1.4	-1.4
2020	-2.9	-4.2	-24.6	-13.8	13.3	6.5	10.0	12.5	-5.3	5.8	2.8	0.6	5.8	2.8	2.8	0.6	0.6
2021	0.0	-5.6	-3.8	12.8	11.0	-4.2	-0.9	-4.6	1.0	2.8	-0.2	-1.7	2.8	-0.2	-0.2	-1.7	-1.7
2022	0.0	-5.0	-10.4	4.1	6.2	-0.7	7.1	-2.6	-1.9	1.0	0.4	2.4	1.0	0.4	0.4	2.4	2.4
2023	-3.5	-10.5	-23.7	5.3	5.1	8.7	6.4	4.3	4.7	1.6	2.1	-0.5	1.6	2.1	2.1	-0.5	-0.5
2024	-3.0	-8.7	-2.0	9.8	10.3	-3.2	-7.4	-7.2	1.3	6.1	3.8	0.2	6.1	3.8	3.8	0.2	0.2
Overall average	-2.6	-7.6	-6.3	1.8	4.0	1.0	2.3	1.9	1.1	2.4	2.6	0.9	2.4	2.6	2.6	0.9	0.9
2005-2014 avg	-2.9	-10.8	-2.8	2.0	1.7	-0.2	1.7	2.3	2.0	2.8	3.5	1.8	2.8	3.5	3.5	1.8	1.8
2015-2024 avg	-2.6	-4.6	-11.7	2.3	6.2	2.1	2.8	2.3	0.8	3.4	1.5	-0.5	3.4	1.5	1.5	-0.5	-0.5
2020-2024 avg	-1.9	-6.8	-12.9	3.6	9.2	1.4	3.0	0.5	0.0	3.4	1.8	0.2	3.4	1.8	1.8	0.2	0.2

Sonar-Harvest Balance (percents of season totals)

Table E4b. Balance between Miles Lake sonar passage and Copper River District commercial harvest (passage percent - harvest percent¹) by statistical week (StatWk) and year, 2003-2024. Sums for statistical weeks 20-22 are in bold font. Green-to-red color ramps reflect variation among individual statistical weeks for a single year or among averages for different time periods, with red indicating degree to which harvest exceeds sonar passage and green indicating degree to which sonar passage exceeds commercial harvest. Color ramp for the **sum of weeks 20-22 (bold font)** reflects variation among years or among averages for different time periods.

Year	May		June		July		Sum Wks 20-22							
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25	StatWk26	StatWk27	StatWk28	StatWk29	StatWk30	StatWk31		
2003	-2.4	-5.7	-2.4	1.8	6.8	2.8	3.7	-2.8	-3.4	-7.0	6.5	3.5		
2004	0.1	-6.6	9.7	-5.1	2.7	0.7	1.0	-2.3	0.2	-2.2	0.3	2.4		
2005	0.5	-7.3	-5.9	-5.8	2.2	4.7	1.1	5.2	0.8	-0.9	3.1	4.4		
2006	-7.4	-6.2	10.3	5.3	-0.1	-3.2	-2.5	-0.6	0.5	3.5	4.7	-0.1		
2007	-5.2	-4.8	-6.1	6.4	-3.0	-6.5	6.5	7.4	2.9	-0.3	1.3	2.6		
2008	-0.9	-18.1	-6.4	-8.6	-4.2	-1.9	7.3	14.5	6.8	5.1	3.9	2.7		
2009	-2.4	-14.7	-7.4	-3.8	3.2	5.3	4.5	3.8	-0.6	1.2	8.7	3.3		
2010	-1.2	-12.8	-6.3	16.5	2.0	0.6	-0.5	2.0	3.9	-4.0	-2.2	3.0		
2011	0.0	-9.6	1.9	2.0	-0.1	0.5	-0.4	-6.9	-1.7	6.5	6.4	1.8		
2012	-7.8	-17.6	11.4	0.3	-2.0	1.8	4.1	-1.9	1.9	7.9	1.9	-0.1		
2013	-4.9	-11.9	-16.2	11.9	22.2	-5.6	-4.1	-0.2	2.3	3.6	3.2	-0.1		
2014	-0.1	-4.6	-3.0	-4.4	-3.0	1.9	0.5	0.1	3.2	5.3	4.4	0.1		
2015	-0.9	0.9	-8.4	-2.5	3.2	-3.0	-0.1	3.4	2.8	4.7	4.5	-1.7		
2016	0.5	-0.7	-2.9	-1.0	7.4	3.9	-3.7	-2.0	0.1	0.5	-0.8	0.3		
2017	-6.0	-2.9	0.8	0.0	-1.2	2.9	1.2	4.2	1.3	2.2	0.4	-1.6		
2018	-9.3	-9.2	-38.8	12.2	11.4	6.4	16.4	17.7	1.7	-1.6	-1.4	-1.2		
2019	-0.6	-0.6	-3.7	-3.9	-4.5	3.9	-0.4	-3.1	2.6	10.5	3.2	-1.4		
2020	-2.9	-4.2	-24.6	-13.8	13.3	6.5	10.0	12.5	-5.3	5.8	2.8	0.6		
2021	0.0	-5.6	-3.8	12.8	11.0	-4.2	-0.9	-4.6	1.0	2.8	-0.2	-1.7		
2022	0.0	-5.0	-10.4	4.1	6.2	-0.7	7.1	-2.6	-1.9	1.0	0.4	2.4		
2023	-3.5	-10.5	-23.7	5.3	5.1	8.7	6.4	4.3	4.7	1.6	2.1	-0.5		
2024	-3.0	-8.7	-2.0	9.8	10.3	-3.2	-7.4	-7.2	1.3	6.1	3.8	0.2		
Overall avg.	-2.6	-7.5	-6.5	1.4	3.7	1.2	2.7	2.3	1.1	2.2	2.5	0.9		
10-yr avg. (2005-2014)	-2.9	-10.8	-2.8	2.0	1.7	-0.2	1.7	2.3	2.0	2.8	3.5	1.8		
10-yr avg. (2015-2024)	-2.6	-4.6	-11.7	2.3	6.2	2.1	2.8	2.3	0.8	3.4	1.5	-0.5		
5-yr avg. (2020-2024)	-1.9	-6.8	-12.9	3.6	9.2	1.4	3.0	0.5	0.0	3.4	1.8	0.2		

¹ Passage and harvest percent calculated on basis of season totals.

Sonar-Harvest Balance with 5-day Harvest Lag (percents of season totals)

Table E5a. Balance between Miles Lake sonar passage and Copper River District commercial harvest *with 5-d lag* ("sonar-harvest balance, calculated as passage percent of season total - harvest percent of season total) by statistical week (Stat Wk) and year, 2003-2024. **Sums for statistical weeks 20-22 are in bold font.**

Year	May			Sum Wks 20-22	June			July						
	Stat Wk 20	Stat Wk 21	Stat Wk 22		Stat Wk 23	Stat Wk 24	Stat Wk 25	Stat Wk 26	Stat Wk 27	Stat Wk 28	Stat Wk 29	Stat Wk 30	Stat Wk 31	
2003	0.6	-1.2	-5.5	-6.1	2.7	6.9	0.7	3.8	0.5	-5.5	-8.7	5.1	2.5	
2004	0.1	-1.7	10.6	9.0	-3.0	-0.5	1.4	0.1	-1.6	-1.1	-2.5	-2.9	2.5	
2005	0.5	0.1	-5.5	-4.8	-2.9	-4.6	3.7	4.0	1.9	1.0	-0.7	2.0	3.7	
2006	-1.9	-11.7	27.4	13.8	-7.4	0.1	0.8	-6.8	-0.8	-0.7	2.3	4.7	-1.8	
2007	-1.2	-8.8	5.5	-4.5	-0.5	-1.4	-6.8	2.6	8.9	2.4	-1.2	1.6	1.2	
2008	0.0	-6.8	-18.7	-25.4	5.0	-17.8	-1.9	7.3	17.4	6.1	3.2	3.8	2.6	
2009	0.0	-6.9	-5.6	-12.5	-11.5	-1.2	13.3	-0.6	4.0	0.8	0.2	5.6	3.6	
2010	0.0	-6.4	-8.0	-14.4	10.6	5.1	0.3	-0.5	2.2	10.3	-2.3	-9.7	0.8	
2011	0.0	-4.1	4.6	0.6	-2.2	-1.1	-0.9	0.8	-3.3	-4.0	5.6	4.7	0.7	
2012	0.6	-12.4	4.9	-6.9	-4.2	-2.2	2.1	5.8	-3.2	1.0	6.9	1.2	-0.4	
2013	0.0	-16.8	-16.2	-33.1	11.9	30.9	-10.1	-0.4	-2.8	-0.4	1.8	2.6	-0.1	
2014	1.5	4.7	-4.9	1.3	-1.3	-10.5	2.2	-1.0	-0.3	0.6	7.0	3.2	-0.4	
2015	0.2	3.6	2.0	5.8	-9.2	3.9	-4.7	-3.1	2.6	2.4	3.4	4.7	-1.5	
2016	0.5	4.4	0.3	5.2	-4.4	5.3	6.0	-1.9	-3.3	-0.6	-1.2	-2.1	-1.1	
2017	0.8	-3.1	2.3	0.0	-1.2	-2.7	3.3	-2.8	5.2	1.2	1.1	0.3	-2.4	
2018	0.0	-18.6	-38.8	-57.3	12.2	11.4	6.4	16.4	17.7	1.7	12.9	-10.6	-5.2	
2019	1.2	2.6	-1.4	2.4	-1.3	-9.5	2.2	2.4	-4.7	0.4	9.5	2.9	-1.4	
2020	0.0	-7.1	-24.6	-31.7	-13.8	13.3	16.4	0.1	12.5	-5.3	8.6	0.0	0.6	
2021	0.0	-2.3	-7.1	-9.4	12.8	20.6	-4.1	-7.1	-0.2	-1.5	4.5	-5.0	-1.0	
2022	0.0	-2.6	-1.1	-3.7	6.4	-3.3	2.3	6.6	-3.6	-4.4	-0.4	-1.0	2.2	
2023	-1.4	-7.6	-14.2	-23.2	-9.1	5.1	14.6	4.8	6.2	4.6	-1.0	-0.5	-1.1	
2024	0.0	-6.4	-1.2	-7.5	8.9	15.8	-6.7	-7.7	-3.4	-5.7	4.8	1.5	0.0	
Overall average	0.1	-4.9	-4.3	-9.2	-0.1	2.9	1.9	1.0	2.4	0.2	2.4	0.5	0.2	
2005-2014 avg	0.0	-6.9	-1.7	-8.6	-0.3	-0.3	0.3	1.1	2.4	1.7	2.3	2.0	1.0	
2015-2024 avg	0.1	-3.7	-8.4	-11.9	0.1	6.0	3.6	0.8	2.9	-0.7	4.2	-1.0	-1.1	
2020-2024 avg	-0.3	-5.2	-9.6	-15.1	1.0	10.3	4.5	-0.7	2.3	-2.5	3.3	-1.0	0.1	

Sonar-Harvest Balance with 5-day Harvest Lag (percents of season totals)

Table E5b. Balance between Miles Lake sonar passage and Copper River District commercial harvest **with 5-d lag** ("sonar-harvest balance, calculated as passage percent of season total - harvest percent of season total) by statistical week (Stat Wk) and year, 2003-2024. **Sums for statistical weeks 20-22 are in bold font.** Green-to-red color ramps reflect variation among individual statistical weeks for a single year or among averages for different time periods, with red indicating degree to which harvest exceeds sonar passage and green indicating degree to which sonar passage exceeds commercial harvest (5-d lag) . Color ramp for the sum of weeks 20-22 reflects variation among years or among averages for different time periods.

Year	May			June			July			Stat Wk 29	Stat Wk 30	Stat Wk 31
	Stat Wk 20	Stat Wk 21	Stat Wk 22	Stat Wk 23	Stat Wk 24	Stat Wk 25	Stat Wk 26	Stat Wk 27	Stat Wk 28			
2003	0.6	-1.2	-5.5	2.7	6.9	0.7	3.8	0.5	-5.5	-8.7	5.1	2.5
2004	0.1	-1.7	10.6	-3.0	-0.5	1.4	0.1	-1.6	-1.1	-2.5	-2.9	2.5
2005	0.5	0.1	-5.5	-2.9	-4.6	3.7	4.0	1.9	1.0	-0.7	2.0	3.7
2006	-1.9	-11.7	27.4	-7.4	0.1	0.8	-6.8	-0.8	-0.7	2.3	4.7	-1.8
2007	-1.2	-8.8	5.5	-0.5	-1.4	-6.8	2.6	8.9	2.4	-1.2	1.6	1.2
2008	0.0	-6.8	-18.7	5.0	-17.8	-1.9	7.3	17.4	6.1	3.2	3.8	2.6
2009	0.0	-6.9	-5.6	-11.5	-1.2	13.3	-0.6	4.0	0.8	0.2	5.6	3.6
2010	0.0	-6.4	-8.0	10.6	5.1	0.3	-0.5	2.2	10.3	-2.3	-9.7	0.8
2011	0.0	-4.1	4.6	-2.2	-1.1	-0.9	0.8	-3.3	-4.0	5.6	4.7	0.7
2012	0.6	-12.4	4.9	-4.2	-2.2	2.1	5.8	-3.2	1.0	6.9	1.2	-0.4
2013	0.0	-16.8	-16.2	11.9	30.9	-10.1	-0.4	-2.8	-0.4	1.8	2.6	-0.1
2014	1.5	4.7	-4.9	-1.3	-10.5	2.2	-1.0	-0.3	0.6	7.0	3.2	-0.4
2015	0.2	3.6	2.0	-9.2	3.9	-4.7	-3.1	2.6	2.4	3.4	4.7	-1.5
2016	0.5	4.4	0.3	-4.4	5.3	6.0	-1.9	-3.3	-0.6	-1.2	-2.1	-1.1
2017	0.8	-3.1	2.3	-1.2	-2.7	3.3	-2.8	5.2	1.2	1.1	0.3	-2.4
2018	0.0	-18.6	-38.8	12.2	11.4	6.4	16.4	17.7	1.7	12.9	-10.6	-5.2
2019	1.2	2.6	-1.4	-1.3	-9.5	2.2	2.4	-4.7	0.4	9.5	2.9	-1.4
2020	0.0	-7.1	-24.6	-13.8	13.3	16.4	0.1	12.5	-5.3	8.6	0.0	0.6
2021	0.0	-2.3	-7.1	12.8	20.6	-4.1	-7.1	-0.2	-1.5	4.5	-5.0	-1.0
2022	0.0	-2.6	-1.1	6.4	-3.3	2.3	6.6	-3.6	-4.4	-0.4	-1.0	2.2
2023	-1.4	-7.6	-14.2	-9.1	5.1	14.6	4.8	6.2	4.6	-1.0	-0.5	-1.1
2024	0.0	-6.4	-1.2	8.9	15.8	-6.7	-7.7	-3.4	-5.7	4.8	1.5	0.0
Overall average	0.1	-4.9	-4.3	-0.1	2.9	1.9	1.0	2.4	0.2	2.4	0.5	0.2
2005-2014 avg	0.0	-6.9	-1.7	-0.3	-0.3	0.3	1.1	2.4	1.7	2.3	2.0	1.0
2015-2024 avg	0.1	-3.7	-8.4	0.1	6.0	3.6	0.8	2.9	-0.7	4.2	-1.0	-1.1
2020-2024 avg	-0.3	-5.2	-9.6	1.0	10.3	4.5	-0.7	2.3	-2.5	3.3	-1.0	0.1

Attachment F – Letters of Concern, Wrangell-St. Elias Subsistence Resource Commission

**Wrangell-St. Elias National Park
Subsistence Resource Commission**

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 19, 2021

Mārit Carlson-Van Dort, Chair
Alaska Board of Fisheries
c/o ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Subject: King salmon escapement goal for Copper River

Dear Ms. Carlson-Van Dort:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met by teleconference on October 5 and 6, 2021. The commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At this meeting, learned about a proposed change to the Copper River king salmon sustainable escapement goal as described in the Department of Fish and Game's March 16, 2020 Prince William Sound Escapement Goal Memo.

The Commission is concerned that the Department is considering lowering the king salmon sustainable escapement goal for the Copper River from a lower bound of 24,000 to a range of 21,000 to 31,000. Lowering the goal could mean that additional fishing is allowed and thus that fewer fish would enter the river or make it to the spawning grounds. The minimum escapement goal has not been met in four of the last ten years. The Commission does not support lowering the king salmon escapement goal for Copper River.

Thank you for the opportunity to comment.

Sincerely,



Daniel E. Stevens
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Daniel E. Stevens; Members: Mike Christenson, Mike Cronk, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan

**Wrangell-St. Elias National Park
Subsistence Resource Commission**

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 30, 2021

The Honorable Mike Dunleavy
Governor of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Subject: Importance of Copper River Salmon

Dear Governor Dunleavy:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. The commission met by teleconference on October 5 and 6, 2021. I am writing to bring to your attention an important issue that came up during the meeting.

Salmon are a critically important resource for food security in Alaska. The commission is concerned about low returns of sockeye and Chinook salmon on the Copper River in recent years, especially in light of the run failures this summer on the Yukon River. Subsistence resources such as salmon need to be protected at all costs. We want to make sure that the Copper River salmon runs don't experience what has happened on the Yukon.

Thank you for your attention to this important issue.

Sincerely,



Daniel E. Stevens
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Daniel E. Stevens; Members: Mike Christenson, Mike Cronk, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 30, 2021

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Subject: Importance of Copper River Salmon

Dear Madam Secretary:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. The commission met by teleconference on October 5 and 6, 2021. I am writing to bring to your attention an important issue that came up during the meeting.

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Thank you for your attention to this important issue.

Sincerely,



Daniel E. Stevens
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Daniel E. Stevens; Members: Mike Christenson, Mike Cronk, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan

**Wrangell-St. Elias National Park
Subsistence Resource Commission**

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

July 25, 2022

The Honorable Mike Dunleavy
Governor of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Subject: Concerns regarding Alaska salmon fisheries

Dear Governor Dunleavy:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met by teleconference on March 1, 2022. The Commission is a federal advisory committee that was established pursuant to the provisions of the Alaska National Interest Lands Conservation Act (ANILCA) and represents subsistence users of federal lands within Wrangell-St. Elias National Park. I am writing to share concerns discussed during the meeting about Alaska's salmon fisheries, especially those on the Copper River. They are also being shared with the Federal Subsistence Board and Secretary of the Interior Deb Haaland.

Salmon runs across Alaska have been low in recent years. While the Commission is especially concerned about Copper River salmon, it is important to recognize that the Copper River is part of a larger system. The Commission does not want the Copper to experience the kind of fisheries crisis that is occurring on the Yukon River. When escapement is low, there is a need to be very concerned about what is happening to the fish. One member noted that when a resource gets depleted in one location, another place begins to feel the effects. He said that the Copper may see increased use, for example in the Chitina personal use fishery, from people displaced from the Yukon.

The Commission discussed both process-related and conservation issues regarding Federal Fisheries Proposal FP21-10, to establish a new Federal subsistence fishery on the lower Copper River. For the reasons discussed below, the Commission unanimously voted to oppose the proposal. The Federal Subsistence Board's direction to the Southcentral and Eastern Interior Regional Advisory Councils (RACs) to meet jointly and reach a compromise essentially amounts to telling the Councils that the fishery needs to be allowed. The Councils had made their recommendations, and the Board should have acted based on those original recommendations.

Page 2 of 2

Telling the Councils to compromise means that they didn't have the choice to do otherwise. Additionally, there are a number of new Council members for whom this is essentially a new proposal; they need time to get up to speed and have their questions answered. Other concerns about the joint meeting include the virtual format, lack of opportunity for public input, and the need to include new information relevant to the proposal.

Although the Commission was unhappy about the direction to hold a joint meeting and to compromise, it is also disappointed that a working group was not established on the proposal. Working groups are an opportunity to discuss issues and build bridges, which is more important than starting up a new fishery.

Additionally, there is new information relevant to salmon conservation concerns on the Upper Copper River that has not been adequately addressed in discussions of FP21-10. The uppermost segment of the Glennallen Subdistrict (Gakona to Slana) has failed to meet the State of Alaska's Amounts Necessary for Subsistence (ANS) for 13 out of the last 15 years, and the Tonsina-to-Gakona segment similarly failed to reach the ANS in 3 of the last 5 years. The enclosed handout that was provided to the SRC by the Ahtna Intertribal Resource Commission illustrates this point. One member reported having heard from people on the upper river that they are not getting enough salmon for at least 5 years and said that that has also been the experience at her family's fish wheel. Additionally, the Commission heard from the Alaska Department of Fish and Game area biologist at the SRC meeting about a possibility that Copper River salmon returns will be low in the next 5 to 6 years. Cordova residents already have ample opportunities to harvest salmon outside of the main stem of the Copper River, whereas residents of the upriver communities only have the Copper. This is new information that should have been provided to the RACs for their joint meeting on FP21-10.

Thank you for your attention to this important issue.

Sincerely,



Daniel E. Stevens
Chair

Enclosure: AITRC Assessment of Upper Copper River Amounts Necessary for Subsistence

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Daniel E. Stevens; Members: Mike Christenson, Mike Cronk, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

July 25, 2022

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Subject: Concerns regarding Alaska salmon fisheries

Dear Madam Secretary:

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Salmon runs across Alaska have been low in recent years. While the Commission is especially concerned about Copper River salmon, it is important to recognize that the Copper River is part of a larger system. The Commission does not want the Copper to experience the kind of fisheries crisis that is occurring on the Yukon River. When escapement is low, there is a need to be very concerned about what is happening to the fish. One member noted that when a resource gets depleted in one location, another place begins to feel the effects. He said that the Copper may see increased use, for example in the Chitina personal use fishery, from people displaced from the Yukon.

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Page 2 of 2

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Thank you for your attention to this important issue.

Sincerely,



Daniel E. Stevens
Chair

Enclosure: AITRC Assessment of Upper Copper River Amounts Necessary for Subsistence

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Daniel E. Stevens; Members: Mike Christenson, Mike Cronk, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 1, 2023

The Honorable Mike Dunleavy
Governor of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Subject: Urgent food security concerns in rural Alaska

Dear Governor Dunleavy:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. According to its charter, one of the Commission's duties is to make recommendations to the Secretary of the Interior and the Governor of Alaska about the subsistence hunting program for the park and its implementation after considering relevant data and hearing from the public. The Commission met in Copper Center, Alaska, on September 27 and 28, 2023, to develop comments on proposed changes to wildlife harvest regulations and to hear reports from agency staff and the public.

Based on reports and discussion at the meeting, we are writing to you as well as Secretary Haaland to express our grave concerns about rapidly declining populations of important subsistence resources in the Wrangell-St. Elias area (Units 11, 12, and 13) and to request that immediate action be taken to address the resulting food security concerns and protect the subsistence way of life in our area.

Two severe winters in a row have taken a serious toll on the Nelchina caribou herd. The herd has dropped from a population estimate of 53,500 in summer 2019 to a minimum count of 7,384 this summer. The Federal Subsistence Board has closed the Unit 13 fall caribou hunt along with the winter caribou hunts in Units 11, 12, and 13. State hunts on the Nelchina herd are also closed both this year and next year. Sheep numbers across Alaska are also declining, with only 10 full-curl rams counted during a recent survey in the eastern Mentasta Mountains, a 73 percent decrease from a previous survey conducted in 2018. Many local families were unable to find and harvest a moose this year. Although this year's salmon return to the Copper River was good, high water along with late timing of the runs created challenges to subsistence fishing. High water reduces the effectiveness of fish wheels, the traditional harvest method on the river, and some families lost their wheels due to the high water.

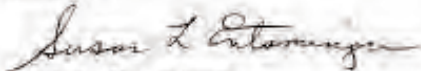
Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan

Page 2 of 2

In closing, the Commission believes that the situation in the Wrangell-St. Elias area on a par with that for salmon on the Yukon River, where local subsistence users are at risk of not being able to put food in their freezers and continue their cultural, customary, and traditional activities. The Commission requests immediate action and collaboration to address these food security concerns in the context of uncertainty and extreme changes.

Thank you for your attention to this important issue.

Sincerely,



Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 1, 2023

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Subject: Urgent food security concerns in rural Alaska

Dear Madam Secretary:

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Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan

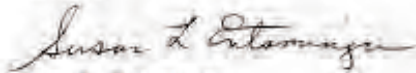
Page 2 of 2

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Thank you for your attention to this important issue.

Sincerely,



Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan

**Wrangell-St. Elias National Park
Subsistence Resource Commission**

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 13, 2024

The Honorable Mike Dunleavy
Governor of Alaska
P.O. Box 110001
Juneau, AK 99811-0001

Subject: Copper River Chinook Salmon Concerns

Dear Governor Dunleavy:

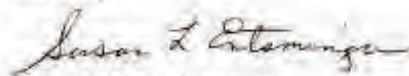
The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 4 and 5, 2024. The commission is a federal advisory committee that represents subsistence users of federal lands in Wrangell-St. Elias National Park and Preserve.

Based on reports and discussion at the meeting, we are writing to you as well as Secretary of the Interior Deb Haaland to express our concerns about Copper River Chinook salmon. Commission members are concerned about the number of salmon that are being caught in the commercial fishery at the mouth of the Copper River before there are fish in the river. Restaurants and markets in Seattle are getting Copper River Chinook and sockeye salmon before residents of the Copper River valley. This summer, the Alaska Department of Fish and Game closed state-managed in-river fisheries, including a state subsistence fishery, to the harvest of Chinook salmon for much of the season due to low returns, while the commercial fishery at the mouth of the river continued harvesting Chinook.

Additionally, the National Oceanic and Atmospheric Administration is considering a petition to list Chinook salmon as a threatened or endangered species under the Endangered Species Act. Such a listing would also impact harvest opportunities for other species of salmon in our area because most harvest methods don't differentiate among salmon species. It is important to protect Chinook salmon so that they are not listed as threatened or endangered.

Thank you for your attention to this important issue.

Sincerely,



Susan L. Entsminger
Chair

Chair: Sue Entsminger, Members: Nathan Brown, Bruce Ervin, Daryl James, M. Starr Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens. Alternate: Edward GreyBear.

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

November 13, 2024

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Subject: Copper River Chinook Salmon Concerns

Dear Madam Secretary:

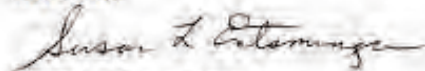
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Thank you for your attention to this important issue.

Sincerely,



Susan L. Entsminger
Chair

Chair: Sue Entsminger; Members: Nathan Brown, Bruce Ervin, Daryl James, M. Starr Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens. Alternate: Edward GreyBear.

Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

October 10, 2024

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

Subject: Comments on Alaska Board of Fisheries Proposals for Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Meeting

Dear Alaska Board of Fisheries Members:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 4 and 5, 2024. The Commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At the meeting, the Commission reviewed proposals to be considered by the Board at its Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Meeting.

Proposal 48: Repeal the prohibition of subsistence guide services in the Glennallen

Subdistrict. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 48. Commission members are concerned that the use of a guide in the subsistence fishery can be abused.

Proposal 50: Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen

Subdistricts. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 50. The Commission heard public testimony that boat-based dip-netters use these technologies to target fish that are holding up deep in the river that would otherwise be headed up-river.

Proposals 51, 52, and 53: Revise Copper River District Salmon Management Plan. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposals 51, 52, and 53 to delay the Copper River District commercial salmon fisheries after the first two openers when Miles Lake sonar passage is below management objectives. The Commission heard testimony that people living on the upper reaches of the Copper River are seeing fewer salmon. There is a need to get more fish in the river for people who fish upriver.

Chair: Sue Entsminger; Members: Nathan Brown, Bruce Ervin, Daryl James, Mercedes Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens

Commission members are very concerned that people in Seattle are getting Copper River salmon before people who live on the river. Protecting the resource and ensuring escapement are important to everyone, and the burden of conservation should not fall only on subsistence users; the commercial fishery should also help. It was also noted it is part of Ahtna and Upper Tanana tradition to allow the first fish go by to celebrate them for the long travel to their spawning grounds.

Proposal 54: Restrict use of Copper River District inside closure area during statistical weeks 20 and 21. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 54. The inside closure is in place to help allow early run salmon, especially Chinook salmon, enter the Copper River. The Commission is concerned about ensuring sufficient early season salmon enter the river.

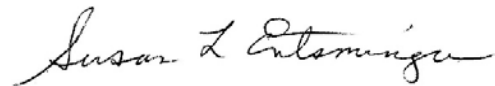
Proposal 70: Extend the lower boundary of the Chitina Subdistrict. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 70 due to conservation concerns about impacts to salmon. The proposed expansion area is a place that fish might rest before going into the canyon. Increased boat activity would impact their ability to do so. There are also tributary streams in the area that could potentially be disturbed by the expansion.

Proposal 89: Increase the bag and possession limit for burbot in Lake Louise. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 89. Lake Louise is an easily accessible for local residents to fish, and the burbot population has increased. Increasing the harvest and possession limits for burbot there will help local families to get more burbot.

Proposal 90: Modify bag and possession limits of burbot in Crosswind Lake. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 90. This proposal would reduce opportunities for burbot harvest due to concerns about incidental harvest of lake trout. A Commission member said that based on information from the local ADF&G fisheries biologist along with her experience, it is unlikely that burbot fishing in the lake is creating conservation concerns for lake trout.

Thank you for considering our suggested comments.

Sincerely,



Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Sue Entsminger; Members: Nathan Brown, Bruce Ervin, Daryl James, Mercedes Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens

November 24, 2024

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


Dear Board of Fisheries,

I am from Nikolaevsk, Alaska, and I am writing to express my strong opposition to Proposal 78. I am a seiner in Prince William Sound, and Alaska salmon is the primary source of revenue for me and my family. A 25% reduction in the egg take would directly result in a 25% reduction in revenue. This is in addition to the significant decline in fish prices over the past two years and a disastrous return this summer.

Operating costs have also increased sharply in recent years. With low prices and poor returns, attracting good crew members is becoming more difficult. Imagine how much harder it will be with the proposed 25% reduction. In my opinion, this could devastate many commercial fishermen and place even more strain on the communities where they live—especially young fishermen who are already in debt. To those proposing this reduction: are you willing to cover the lost revenue? Taking drastic actions based on theory, without considering the livelihoods of Alaskans, should never be allowed.

Thank you.

Sincerely,
Sergey Yakunin


Nikolaevsk, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I am from Nikolaevsk, Alaska, and I am a seiner in Prince William Sound. Alaska salmon is the primary source of revenue for me and my family. A 25% reduction in the egg take would directly result in a 25% reduction in revenue. This is in addition to the significant decline in fish prices over the past two years and a disastrous return this summer. Operating costs have also increased sharply in recent years. With low prices and poor returns, attracting good crew members is becoming more difficult. Imagine how much harder it will be with the proposed 25% reduction. In my opinion, this could devastate many commercial fishermen and place even more strain on the communities where they live—especially young fishermen who are already in debt. To those proposing this reduction: are you willing to cover the lost revenue? Taking drastic actions based on theory, without considering the livelihoods of Alaskans, should never be allowed.

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,
Sergey Yakunin


Nikolaevsk, Alaska

PC661

Submitted by: Tristen Yingst

Community of Residence: Wasilla

Comment:

I am commenting on proposal 89, weather or not the limit of burbot on lake Louise should be upped to 2 per day instead of 1. I'm opposing this idea. My reasoning is that the numbers already aren't great and I'd really like to be able to fish for but it with my kids as I was able to as a kid

PC662

2 Submitted by: Omer Yoder

Community of Residence: North Pole

Comment:

As a household that depends on dip netting Copper river salmon every year our goals align closely with the Copper River Dipnetters Association.

PC663

3 Submitted by: Charles Young

Community of Residence: Wasilla

Comment:

Honor our State Constitution and share natural resources with all Alaskans.

My name is Dennis Zadra and I have been a resident and commercial fisherman from Cordova for 34 years. I currently sit on the South Central RAC, the CR/PWS AC and am on the Executive Committee of CDFU. I support the position of CDFU on individual Proposals, but these are my personal comments outside of my Board affiliations.

I arrived in Cordova in 1989 shortly after the oil spill, and the commercial fisheries were thriving with the processing plants being open year around. I decided to abandon a career in Mechanical Engineering and chose to become a fisherman. After 3 years of seining, longlining and crabbing, and thanks to the State's Revolving Loan fund, I was able to purchase a boat and permit and in 1992, I set my first gillnet in the Copper River. I have been intensely fishing it every year since. I am deeply invested in the health of this River and I have seen the bounty that it is capable of producing. Unfortunately, that is not where we are currently, and I have had my 3 worst seasons in the last 8 years. Prior to 2020 and 2018 we never had a Federal disaster declaration for our commercial fishery and in 2018 the reported PU fishery harvest was 68% higher than the commercial harvest. The upriver Subsistence users claim that they are not getting their ANS and we have seen unprecedented restrictions in our commercial fishery. In 2024, we commercially fished for 2 days of the first 23 days of the season which means our nets were in the water 8.7% of the time. Proposals 51, 52, and 53 would further reduce the commercial fishery without any biological or scientific justification, and severely restrict the Department's ability to manage. On the other hand, the PU fishery is growing and thriving, especially for the commercial operators who have no restrictions on expansion whatsoever. I want to be able to pass my operation on to my Grandson, which seems more and more unlikely with the current direction of the management. Additionally, hatchery operations have been a huge success across the State and should not be impeded by special interests relying on bad science.

Finally, I would like to address what I see as bias from the department, primarily as it relates to this Board Cycle. The Department is neutral on Proposals 51, 52 & 53, which are clearly allocative and impose severe limitations on their ability to manage. However, they oppose Proposal 54 which is clearly allocative and imposes limitations on their ability to manage. I am hoping someone can explain the difference to me. I am bothered that the Department is opposed to any proposals that might attempt to establish any crab fisheries in PWS where historically these fisheries provided a great economic opportunity for Cordova. I am bothered by the department opposing Proposal 64, effectively saying that every resident of the State should be allowed to double their PU harvest. Commercial fishing has been the backbone of Cordova's economy, and we are struggling financially. I look forward to sharing dialogue with every Board member and hope to show you how important these issues are to our community.

Submitted by: Thomas Zarrilli

Community of Residence: Talkeetna

Comment:

Proposal 50 OPPOSE- Sonar and chartplotters are used as navigation aids on the Copper. Electronics greatly ENHANCE SAFETY and are not necessary to find fish. On a typical day all someone needs to do to find fish is take two minutes and watch where the other boats are picking them up.

Proposal 70 OPPOSE-The charters exist because there is a demand for them. Unlike many charters Dipnet charters are solely for Alaska residents. Charters allow people that can't afford to keep boats access to the fishery . Charters even provide safe access for people that do have boats but are uncomfortable operating them on the Copper. I seems that the success on charters is used as one of several indicators for the area biologists as to how the run is going. The commercial fisheries guys are the only ones with a reason to inhibit the take of upstream salmon so that they can potentially increase their take. Reportedly just over 60 percent of them are Alaskans.

Submitted by: Todd Zempel

Community of Residence: Eagle River, AK

Comment:

I STRONGLY support PROPOSAL 14, 5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan. Trawl, and especially by-catch, is undeniably having a negative effect on both the Alaskan Ocean floor and the populations of numerous fish species in Alaskan waters. Efforts to curb this destruction must be implemented immediately and PROPOSAL 14, 5 AAC 28.263 offers critical aid to this very significant problem.
