
ALASKA BOARD OF FISHERIES
Prince William Sound and Upper Copper/Upper
Susitna Finfish and Shellfish (except shrimp)
Cordova | December 10 – December 16, 2024

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November 26, 2024

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

Dear Members of the Board of Fisheries,

I am a purse seiner in Prince William Sound. Hatcheries are an integral part of my business and livelihood. A decrease by 25% would have a direct impact on my income, by less revenue. It would also have a huge impact on the value of my permit boat and operation. I strongly disagree with this proposal.

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,

Wayne Ackerlund

A solid black rectangular box used to redact the signature of Wayne Ackerlund.

Valdez, Alaska

Submitted by: Alex Adams

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: Francis Adams

Community of Residence: Fairbanks

Comment:

I support Proposal #14 so that trawl gear cannot be dragged along the seabed to gather fish. Trawling is not sustainable nor in the best interest of the public's resource.

I also support Propopsal #51 to allow a greater opportunity to harvest inriver salmon for subsistence, personal use, and sport fishing in the Copper River.

Thank you for your attention.

November 26, 2024

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

Dear Members of the Board of Fisheries,

Alaska salmon hatcheries have directly benefited both my business and family for multiple generations. Providing economic opportunities and producing a high quality lean protein used globally. Proposal 78 would negatively impact my business, family, and our community as a whole.

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,

Matt Adams

A solid black rectangular box used to redact the signature of Matt Adams.

Cordova, Alaska

Submitted by: Mike Adams

Community of Residence: Cordova Alaska

Comment:

My biggest concern is taking your obvious tool off the copper river delta in May to judge strength of run ie the commercial salmon fleet of area E. It's my belief that our fleet will prove strength of run if given a chance, as we have time and time again. Although hours fished may show our fleet has plenty, we have given up area inside the barrier islands for the entire month of May and June for years, which is a huge financial loss. I am in support of a minimum of 12 hours on Monday and Thursday throughout the entire month of May and June.

Submitted by: Ashley Adams

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: Anfisa Afonin

Community of Residence: Salem, Or

Comment:

I oppose proposals 51, 52, and 53

Submitted by: Marina Afonin

Community of Residence: Homer

Comment:

I strongly oppose proposals 51, 52, and 53. Many fisherman already can't make ends meet. The State of Alaska is making programs and encouraging young fishermen to enter the field. Letting these proposals pass is a step in the wrong direction.

Submitted by: Adam Agosti

Community of Residence: Soldotna

Comment:

Close the PWS walleye pollock pelagic trawl fishery – until the trawler fleet can guarantee they won't disturbed the ocean floor bed. State protection of the seabed ecosystem in Alaska waters is paramount to the future generations of Alaska fisheries.



Ahtna Intertribal Resource Commission

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November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Dear Members of the Alaska Board of Fisheries,

Comments on Proposals

Introductory Comments Relevant to All Copper River Salmon Proposals

Current Copper River salmon management by the State of Alaska is failing to provide reasonable opportunities for customary and traditional uses under AS 16.05.258 and failing to provide for a meaningful federal subsistence priority for federal qualified rural residents under Title 8 of ANLICA.

In 2005, the Alaska Board of Fisheries (BOF) revised the amounts reasonably necessary for customary and traditional subsistence uses (ANS) in the Glennallen Subdistrict (GSD) of the Upper Copper River District into three separate reaches of the drainage to be assessed by reported harvests. The Board determined the ANS from the Chitina Bridge upriver to the mouth of the Tonsina River to be 25,500-39,000 salmon; from the Tonsina River upriver to the mouth of the Gakona River to be 23,500-31,000 salmon; and upriver from the Gakona River to the Slana River and including Batzulnetas to be 12,000-12,500 salmon.

While the ANS range for subsistence salmon harvests in the lowest reach of the GSD from the bridge to Tonsina has been met each year since 2006 (see Figure 1 in Proposal 51 comments), subsistence salmon harvests in the middle and upper reaches of the Copper River have not reached the lower limits of the ANS ranges since 2015, upriver of Gakona, nor since 2018, downriver of Gakona to the mouth of the Tonsina River (Figures 2 and 3 in Proposal 51 comments). Subsistence salmon harvests in the uppermost reach of the Copper River have fallen below the lower limit of the ANS of 12,000 salmon in all years since the BOF established it (effective in 2006) except in 2014 and 2015.

Last year serves as a good case study demonstrating our contention that reasonable opportunities for subsistence uses are no longer provided by the current Copper River salmon management plans. In 2023, the total reported state and federal subsistence harvest was only 2,123 salmon upriver of Gakona, 9,877 fish below the lower boundary of the ANS range of 12,000 to 12,500 salmon. The 2023 subsistence salmon harvest in this portion of the river was the lowest on record. Furthermore, the 2023 total reported state and federal subsistence salmon harvest downriver of Gakona to the mouth of the Tonsina River was only 19,564 salmon, 3,936 below

the lower boundary of the ANS range of 23,500 to 31,000 fish. In the past ten years, customary and traditional subsistence harvests exceeded the lower limit of the ANS range only in 2014-2016 and 2018 with harvests below the lower limit of the ANS range 60% of the time (2017, 2019-2023).

The failure to reach the lower limits of the ANS ranges upriver of Tonsina again in 2023 is concerning given that the 2023 Mile Lake sonar estimated season total fish passage of 991,740 salmon was 71% above management objective (Dave Sarafin, NPS Fisheries Biologist, meeting minutes of the WRST Subsistence Resource Commission, March 14-15, 2024). Where did all those salmon go in 2023 given the failure to reach even the minimum amounts reasonably necessary for subsistence uses upriver of the Tonsina River? Did lack of fishing effort or high water prevent fishing success? Were they intercepted in fisheries downriver of the Tonsina River? Did the 2023 run experience higher levels of in-river mortality thus explaining the lack of salmon in the uppermost reaches of the river?

In 2023, 370 state and federal subsistence fishing permits were fished upriver of Tonsina compared to the recent 2018-2022 five-year average of 375.6 permits fished upriver of Tonsina, so the poor subsistence salmon harvests of 2023 do not appear to be driven by lack of fishing effort.

Poor fishing conditions may be a factor, but successful harvest levels downriver from Tonsina do not suggest that water levels were a limiting factor in harvest levels. However, the later in the season subsistence users must wait to have a reasonable expectation of successful take pursuant to AS 16.05.258(f), the more challenging fishing becomes, especially if the uppermost river stocks do not arrive. Rising river levels due to increasing flows of meltwater runoff and summer rains can contribute to delayed fish passage and degrading weather conditions necessary for effective smoking and drying conditions as the summer progresses. This is why the early part of the Copper River salmon run has always been the most critical for the Ahtna people because those early run stocks customarily and traditionally traveled all the way to the uppermost reaches of the drainage upriver of the Tonsina and Gakona rivers.

Interception of uppermost-bound Copper River salmon stocks downriver in the lower reach of the Glennallen Subdistrict, the Chitina Subdistrict, and the commercial and subsistence fisheries of the lower Copper River and the Copper River District can negatively affect the ability of subsistence fishing households upriver of the Tonsina River to meet their subsistence needs. Sufficient numbers of salmon must be allowed to migrate unmolested through these intercept fisheries to ensure diverse stock escapements and to provide reasonable opportunities for subsistence uses with a reasonable expectation of successful harvest.

From 2014 to 2023, the Chitina Subdistrict Personal Use (PU) dipnet fishery exceeded the Board's allocation quota¹ in 7 of the past 10 years with a 10-yr average harvest of 151,895 salmon (data provided by ADF&G's Mark Somerville on April 19, 2024). The impacts of this trend to upriver priority subsistence users of Copper River Chinook and sockeye salmon must be considered given indicators suggesting that the existing Copper River salmon-related

¹ 5 AAC 77.591(f) states, "The maximum harvest level for the Chitina Subdistrict personal use salmon fishery is 100,000-150,000 salmon, not including any salmon in excess of the inriver goal or salmon taken after August 31."

management plans no longer provide reasonable opportunities for customary and traditional subsistence uses upriver from the mouth of the Tonsina River.

The PU harvest in 2019, for example, was 179,795 fish, whereas the Glennallen Subdistrict and Batzulnetas subsistence salmon harvest upriver from the mouth of the Tonsina River fell below the lower limits of the amounts reasonably necessary for subsistence (ANS) combined by more than 6,500 salmon. Fish harvested downriver cannot be harvested upriver. Furthermore, if adopted at this meeting, ADF&G's Proposal 58 would further increase the allocation of salmon to the PU fishery in Chitina, which would undoubtedly further challenge reasonable opportunities for subsistence uses of salmon upriver from Tonsina.

Commercial salmon fishery interception of Upper Copper River stocks early in the season is increasingly impacting reasonable opportunities for subsistence fishing households upriver of Tonsina to have a reasonable expectation of success in harvesting salmon pursuant to AS 16.05.258.

Based upon assessments conducted by the NPS provided to the Southcentral Regional Advisory Council during their October 10-11, 2024 meeting in support of Proposal 51, management of the Copper River District commercial fishery in 5 of the 6 most recent years from 2018 to 2023 resulted in disproportionately high exploitation rates of early run Copper River salmon stocks. ADF&G commercial fisheries management actions increasingly open commercial salmon harvest opportunities prior to reaching 70% of the cumulative management in-river sonar objective. The number of commercial salmon fishery openers was an average of 2.5 during the ten-year period from 2005 to 2014. This compares to an average of 2.8 openers during the subsequent 2015-2024 ten-year period and 4.8 openers during the most recent 2020-2024 five-year period.

Results of the recent State of Alaska management regime have led to an increasing trend in early season sonar management objective deficits during statistical weeks 20-22, which is represented by the observed Miles Lake sonar passage minus the sonar passage management objective. For example, during the 2005-2014 time period the observed sonar passage was on average 49,490 salmon above management objective. However, the observed passage during the subsequent ten-year period from 2015 to 2024 was 19,475 salmon below management objective during statistical weeks 20-22. This trend worsened during the most recent five-year period between 2020 and 2024 with an average deficit of 92,377 salmon below inriver sonar management objectives (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

The current state salmon management regime is increasing the proportion of early season cumulative commercial salmon harvests of Upper Copper River stocks. The percentage of cumulative commercial sockeye salmon harvest achieved by the date upon which 70% of the cumulative sonar passage management objective was reached was an average of 20.8% during the 2005-2014 ten-year period, 25.1% during the subsequent period of 2015-2024, and increasing to 39.0% during the most recent five-year period from 2020 to 2024. This trend is even more pronounced with respect to cumulative percent of commercial Chinook salmon harvest on dates when the 70% inriver sonar management objective is reached. During the ten-year period 2005-2014, an average of 37.7% of the cumulative commercial Chinook salmon harvest occurred by the date when the 70% management objective was reached, compared to

53.2% during the 2015-2024 subsequent ten-year period, and 79.9% during the most recent five-year period from 2020 to 2024 (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

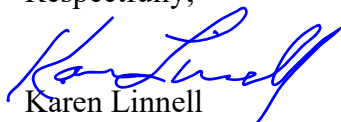
Correspondingly and unfortunately, the trend in frequency of not meeting the lower bound of the Upper Copper River Chinook salmon sustainable escapement goal has increased from 20% during the 2004-2013 period to 40% of the time not meeting escapement during the 2014-2023 and 2019-2023 time periods, respectively. It is important to reiterate that AITRC contends that escapement estimates of Chinook salmon and sockeye salmon stocks are biased high given the “sonar passage minus harvest subtraction method” rather than empirical escapement enumeration and a failure to account for annual variability in inriver salmon mortality (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

Finally, the NPS assessment of ADF&G commercial salmon management provided to the SCRAC in October 2024 demonstrated a declining trend in the total number of salmon harvested per federal subsistence fishing permit upriver of Gakona. The ten-year average total federal salmon harvest from 2004-2013 averaged 80.5 salmon per permit, declining to 64.5 salmon per federal permit during the subsequent ten-year period 2014-2023, and only an average of 45.9 salmon per permit during the 2019-2023 period. This trend also is demonstrated by an assessment of catch per unit effort, where an average of 22.5 salmon were harvested per day during the 2004-2013 time period, 19.4 salmon during the 2014-2023 period, and 14.2 salmon harvested per day fished during the most recent five-year period from 2020 to 2024 (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

These introductory comments serve to demonstrate that the current state Copper River salmon management plans, and their implementation by ADF&G, are failing to provide reasonable opportunities for subsistence under Alaska Statute 16.05.258. The current state management regime also is failing to provide for a meaningful federal subsistence priority for federal qualified rural residents under Title 8 of ANLICA.

These introductory comments also provide important context for AITRC’s positions on individual Board proposals discussed in the following pages.

Respectfully,



Karen Linnell
Executive Director

PROPOSAL 14**5 AAC 28.263. Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan.**

Close the Prince William Sound walleye pollock pelagic trawl fishery, as follows:

Add a new section to 5 AAC 28.263. PWS Walleye Pollock Pelagic Trawl Fishery Management Plan.

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

AITRC supports Proposal 14 given the ongoing challenges in meeting Copper River Chinook salmon escapement and the larger conservation concerns associated with habitat damage associated with the cod-end of pelagic trawl gear dragging on the ocean bottom. Waste of Chinook salmon through trawling bycatch is unacceptable during this period of poor Chinook salmon production and ongoing efforts to list Gulf of Alaska Chinook salmon under the Endangered Species Act.

PROPOSAL 15**5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan**

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.

AITRC supports the intent of Proposal 15 to establish a bycatch cap for all prohibited species catch but prefers board action that prohibits the trawl fishery from impacting Copper River Chinook salmon by eliminating Chinook salmon bycatch altogether as the Alaska Outdoor Council proposed in Proposal 14 and the Chenega Tribe proposed in Proposal 16.

With recent closures of Copper River Chinook salmon subsistence, personal use, and sport fisheries, the burden of conservation should be shared among commercial fisheries as well consistent with the board's Policy for the management of sustainable salmon fisheries that states that "the burden of conservation shall be shared among all fisheries in close proportion to each fisheries' respective use" (5 AAC 39.222(c)(4)(D)).

PROPOSAL 16**5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan**

Close the Prince William Sound pelagic trawl fishery, as follows:

Closure of the Prince William Sound Walleye Pollock Pelagic Trawl Fishery to preserve PWS.

AITRC supports Proposal 16 for reasons outlined in our comments for proposals 14 and 15.

PROPOSAL 17**5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan**

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.

AITRC supports Proposal 17 regarding its intent to better enumerate bycatch of non-target species, especially Chinook salmon. However, it is our understanding that the board is unable to require what this proposal is seeking such that this issue should be brought to the attention of the Alaska Legislature for action.

PROPOSAL 45**5 AAC 01.625. Waters closed to subsistence fishing.**

Allow subsistence fishing for salmon in the Copper River inside closure area, as follows:

We recommend opening inside closure waters to subsistence fishing by adding new subsection 5 AAC 01.648 (c):

5 AAC 01.648(c). Prince William Sound Subsistence Salmon Fisheries Management Plans

(c) Salmon may be taken for subsistence purposes in the inside closure area described in 5 AAC 24.350(1)(B) unless all other Copper River Chinook fisheries have first been restricted.

AITRC supports reasonable opportunities for customary and traditional subsistence fishing; however, we oppose Proposal 45 due to ongoing conservation concerns associated with Copper River Chinook salmon and the amount of time it takes for salmon to enter the Copper River and be enumerated by Miles Lake Sonar after passing through intercept fisheries in the Copper River District.

The requested regulatory change to 5 AAC 01.648 does not appear to be appropriate when addressing subsistence fishing in the Copper River District. 5 AAC 01.647 pertains to Copper River system salmon.

The board has already addressed reasonable opportunities for subsistence fishing in the Copper River District when it adopted two amounts reasonably necessary for subsistence findings: 3,000 – 5,000 salmon in a year when there is a harvestable surplus that allows for a commercial fishery; and 19,000 – 32,000 salmon in a year when there is no commercial fishery (5 AAC 01.616(b)(2)). Subsistence fishing in the Copper River District is open for drift gillnets no longer than 50 fathoms in length with a season from May 15 to September 30. From May 15 until two days before the commercial opener is open 7 days a week. During the commercial fishing season, subsistence fishing is open during commercial openers and on Saturdays from 6:00 am to 10:00 pm. Subsistence fishing is open 7 days a week two days after the closure of the commercial season through October 31. Annual limits are 15 salmon for a household of 1, 30

salmon for a household of two, and 10 salmon for each additional person in the household with a limit of five Chinook salmon per household permit.

The conservation closure inside the barrier islands of the Copper River District was put into place to conserve Copper River Chinook salmon. Allowing unrestricted subsistence fishing within the Chinook salmon savings area may further challenge the ability to meet escapement needs for Chinook salmon upriver by increasing harvest levels beyond historical trends. Restrictions of subsistence fishing in the inside closure area being only dependent upon first restricting all inriver Chinook salmon fisheries (i.e. subsistence, personal use, and sport fishing) does not effectively share the burden of conservation among all users given that Copper River District fisheries occur prior to salmon passage enumeration past Miles Lake Sonar and subsistence fishing restrictions there may be necessary to conserve Chinook salmon before restrictions in the Upper Copper River District are put into place.

PROPOSAL 46

5 AAC 01.630. Subsistence fishing permits.

Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery, as follows:

5 AAC 01.6xx new section

Subsistence harvest from the Copper River district must be reported within 7 days of harvest.

AITRC supports Proposal 46. We would like in-season reporting requirements to be consistent between proposals 46 and 47. Refer to AITRC comments for Proposal 47.

PROPOSAL 47

5 AAC 01.630. Subsistence fishing permits and 5 AAC 77.5XX Personal use fishing permits.

Require in-season reporting in subsistence and personal use fisheries, as follows:

(1) subsistence fishing reports must be completed on forms provided by the department, **or using an online app or phone call** and submitted to the department office from which the permit was issued [at a time specified by the department] **within 5 days of harvest** for each particular area and fishery.

(6) personal use fishing permits must be completed on forms provided by the department, **or using an online app or phone call** and submitted to the department office from which the permit was issued [at a time specified by the department] **within 5 days of harvest** for each particular area and fishery.

While specific regulatory language proposed is unclear, **AITRC supports Proposal 47's** requirement of timely in-season catch reporting and would support alignment with Proposal 46's requirement of reporting within 7 days of harvest. Currently, management action assessment is based on sonar passage minus reported harvest at the end of the season and therefore limited to a report card on a season's management actions taken after the fact. Without enforceable in-season reporting requirements, AITRC contends that harvest is increasingly underestimated as fishing

pressure continues to increase given the dramatic salmon fishing closures across the state. While previous proposals to require in-season reporting have been noted by the department as unnecessary because it is not useful to in-season management, ADF&G and federal managers should consider how in-season harvest information could better characterize the status of a particular season's run as it progresses throughout the season to more responsibly ensure that salmon presumed to be migrating to upriver fisheries and spawning beds are actually arriving there in the numbers estimated by post-season subtraction method of escapement estimation.

Timely reporting in the Chitina Subdistrict salmon catch and harvest, for example, would provide a critical dataset on Chinook salmon catch (in addition to harvest if retention is allowed), which would help managers better understand species composition, population status, inriver mortality, catch-and-release incidental mortality, and run timing to supplement sonar passage estimates that lack species apportionment data. In-season catch and harvest reporting would help to ensure that management actions taken in the Copper River District commercial and subsistence fisheries, Lower Copper River federal subsistence fishery, Chitina Subdistrict personal use and federal subsistence fisheries, and in the lower portions of the Glennallen Subdistrict are achieving the desired management effects at Chinook salmon conservation. Chinook Salmon in the Copper River may once again fail to meet the lower end of the escapement goal for the third time in the last five years despite lowering the escapement goal during the previous board cycle.

Timely in-season reporting requirements also would inform managers when personal use allocation levels are reached in the personal use fishery to not further challenge reasonable opportunities for customary and traditional uses in the Glennallen Subdistrict upriver from the mouth of the Tonsina River. The lower limit of the ANS has not been reached from Tonsina to Gakona since 2018, nor has the ANS been reached upriver of Gakona since 2015. In-season harvest and catch reporting requirements would have the additional benefit of making annual household bag limits enforceable.

PROPOSAL 48

5 AAC 01.620. Lawful gear and gear specifications.

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict, as follows:

Remove prohibition on subsistence guide services in the Glennallen subdistrict. Allow for subsistence guide services in the Glenallen subdistrict notwithstanding the prohibition

AITRC opposes Proposal 48 as it is inappropriate for service providers to benefit commercially from subsistence fisheries by charging fees to take a subsistence fishery permit holder fishing in the Copper River. Alaska law defines subsistence uses as customary and traditional non-commercial uses (AS 16.05.940(7) and (34)). As the board witnessed during the 2021 cycle in RC 091, when this prohibition was adopted, there was clear video evidence that demonstrated that guiding services resulted in some permit holders harvesting so many salmon that they didn't know what they would do with them all. This is contrary to customary and traditional use patterns.

The customary and traditional methods of harvesting salmon from the Copper River included a dip net from a platform in the mainstem, fish weirs and conical traps in tributaries, and spears in

clear water. Using boats for subsistence fishing is not part of the C&T pattern of use of Copper River salmon (Simeone and Kari 2002; Simeone et al. 2007) and instead is effectively a new fishery within a system where salmon are already fully allocated. Therefore, the newly established pattern of using boats for subsistence salmon fishing should be prohibited under a subsistence permit in the Glennallen subdistrict just as it is in the newly established federal subsistence salmon fishery in the Lower Copper River.

Subsistence permit holders taking more salmon than they know what to do with is especially concerning, given that the ANS has not been reached from Tonsina to Gakona since 2018, nor has the ANS been reached upriver of Gakona since 2015.

PROPOSAL 49

5 AAC 01.620. Lawful Gear and Gear Specifications.

Prohibit transport services in the Glennallen Subdistrict, as follows:

5 AAC 01.620(l)(1)

(l) Subsistence fishing guide services are prohibited in the Glennallen Subdistrict. For the purposes of this subsection,

(1) "subsistence fishing guide services" means assistance, for compensation or with the intent to receive compensation, to a subsistence fisherman to take or to attempt to take fish from a vessel by accompanying or physically transporting [DIRECTING] the subsistence fisherman in subsistence fishing activities during any part of a subsistence fishing trip

AITRC submitted and continues to support Proposal 49. Alaska law defines subsistence uses as customary and traditional non-commercial uses (AS 16.05.940(7) and (34)). The customary and traditional methods of harvesting salmon from the Copper River included a dip net from a platform in the mainstem, fish weirs and conical traps in tributaries, and spears in clear water. Using boats for subsistence fishing is not part of the C&T pattern of use of Copper River salmon (Simeone and Kari 2002; Simeone et al. 2007) and instead is effectively a new fishery within a system where salmon are already fully allocated. Therefore, the newly established pattern of using boats for subsistence salmon fishing should be prohibited under a subsistence permit in the Glennallen subdistrict just as it is in the newly established federal subsistence salmon fishery in the Lower Copper River. As the board witnessed during the 2021 cycle in RC 091, when the prohibition of commercial guiding services was adopted, there is clear video evidence that such services resulted in permit holders harvesting so much salmon that they didn't know what they would do with them all. This is especially concerning, given that the ANS has not been reached from Tonsina to Gakona since 2018, nor has the ANS been reached upriver of Gakona since 2015.

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.

Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts, as follows:

5AAC 52.022 (a)(XX) **Electronics including chart-plotters, depth finders, fish finders, or any other device that may aid in locating fish, depth, or paths of travel while fishing may not be used to aid in the taking of fish from a boat in the Chitina and Glennallen Subdistricts.**

AITRC supports Proposal 50. Use of this technology for targeting salmon from boats contributes to the probability of overfishing upriver stocks during high-water events contrary to the long-term customary and traditional patterns of shore-based subsistence fishing. Long-term subsistence fishing families above the Tonsina River are not meeting their customary and traditional needs for Copper River salmon. Based upon local and traditional Indigenous Knowledge, the number of salmon migrating upriver from the mouth of the Tonsina River are consistently over-estimated by the department. The amounts reasonably necessary for subsistence uses findings established by the board have routinely not been met upstream of Tonsina River. Normally diligent subsistence fishwheel operators have not been able to have a reasonable opportunity to harvest Copper River salmon with a reasonable expectation of success in harvesting salmon and use of boats and fish-finder technologies are disproportionately impacting salmon bound for the uppermost reaches of the Copper River drainage.

Fish finders and other devices are technologies that are in no way customary and traditional to the subsistence fishery in the Glennallen Subdistrict (Simeone and Kari 2002; Simeone et al. 2007). Restricting fish-finders and other devices would most likely have little impact on experienced Copper River fishing households, who typically already know where to use dipnets and fishwheels from the shore to target salmon consistent with the customary and traditional patterns documented in the public record. Restricting the use of fish-finders would encourage inexperienced fishers to personally develop the knowledge and experience that are essential for safely fishing on a swift and dangerous river such as the Copper. Technology used to locate fish are not necessary as a safety device on the Copper River, as the river is too swift and silty for them to be effective. In fact, their use promotes more dangerous boating behaviors, as fishers who use them tend to look down at these devices when they should be actively trying to read the river.

PROPOSAL 51

5 AAC 24.360. Copper River District Salmon Management Plan.

Reduce commercial salmon fishing opportunity in the Copper River District, 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.

AITRC supports Proposal 51. AITRC submitted a similar regulatory change request in Proposal 52 that used daily management objectives at Miles Lake sonar rather than Proposal 51's use of 70% of the cumulative management objective. AITRC supports Proposal 51 over

proposals 52 and 53 given the detailed analysis and justifications provided by WRST NPS in developing Proposal 51.

Based upon assessments conducted by the NPS provided to the Southcentral Regional Advisory Council during their October 10-11, 2024 meeting in support of Proposal 51, management of the Copper River District commercial fishery in 5 of the 6 most recent years from 2018 to 2023 resulted in disproportionately high exploitation rates of early run Copper River salmon stocks. ADF&G commercial fisheries management actions increasingly open commercial salmon harvest opportunities prior to reaching 70% of the cumulative management in-river sonar objective. The number of commercial salmon fishery openers was an average of 2.5 during the ten-year period from 2005 to 2014. This compares to an average of 2.8 openers during the subsequent 2015-2024 ten-year period and 4.8 openers during the most recent 2020-2024 five-year period.

Results of the recent State of Alaska management regime have led to an increasing trend in early season sonar management objective deficits during statistical weeks 20-22, which is represented by the observed Miles Lake sonar passage minus the sonar passage management objective. For example, during the 2005-2014 time period the observed sonar passage was on average 49,490 salmon above management objective. However, the observed passage during the subsequent ten-year period from 2015 to 2024 was 19,475 salmon below management objective during statistical weeks 20-22. This trend worsened during the most recent five-year period between 2020 and 2024 with an average deficit of 92,377 salmon below inriver sonar management objectives (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

The current state salmon management regime is increasing the proportion of early season cumulative commercial salmon harvests of Upper Copper River stocks. The percentage of cumulative commercial sockeye salmon harvest achieved by the date upon which 70% of the cumulative sonar passage management objective was reached was an average of 20.8% during the 2005-2014 ten-year period, 25.1% during the subsequent period of 2015-2024, which increased to 39.0% during the most recent five-year period from 2020 to 2024. This trend is even more pronounced with respect to cumulative percent of commercial Chinook salmon harvest on dates when the 70% inriver sonar management objective is reached. During the ten-year period 2005-2014, an average of 37.7% of the cumulative commercial Chinook salmon harvest occurred by the date when the 70% management objective was reached, compared to 53.2% during the 2015-2024 subsequent ten-year period, and 79.9% during the most recent five-year period from 2020 to 2024 (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

Correspondingly and unfortunately, the trend in frequency of not meeting the lower bound of the Upper Copper River Chinook salmon sustainable escapement goal has increased from 20% during the 2004-2013 period to 40% of the time not meeting escapement during the 2014-2023 and 2019-2023 time periods, respectively (NPS handout supporting Proposal 51, October 2024 SCRAC meeting). It is important to reiterate that AITRC contends that escapement estimates of Chinook salmon and sockeye salmon stocks are biased high given the “sonar passage minus harvest subtraction method” rather than empirical escapement enumeration and a failure to account for annual variability in inriver salmon mortality.

Finally, the NPS assessment of ADF&G commercial salmon management provided to the SCRAC in October 2024 demonstrated a declining trend in the total number of salmon harvested per federal subsistence fishing permit upriver of Gakona. The ten-year average total federal salmon harvest from 2004-2013 averaged 80.5 salmon per permit, declining to 64.5 salmon per federal permit during the subsequent ten-year period 2014-2023, and only an average of 45.9 salmon per permit during the 2019-2023 period. This trend also is demonstrated by an assessment of catch per unit effort, where an average of 22.5 salmon were harvested per day during the 2004-2013 time period, 19.4 salmon during the 2014-2023 period, and 14.2 salmon harvested per day fished during the most recent five-year period from 2020 to 2024 (NPS handout supporting Proposal 51, October 2024 SCRAC meeting).

AITRC supports Proposal 51 because in the earliest weeks of the commercial fishery, upriver stocks of Chinook and sockeye salmon have been demonstrated to be disproportionately impacted. Interception of salmon stocks bound for the uppermost reaches of the Copper River drainage, as well as early run components of tributary stocks in the middle river such as the Klutina River, negatively impacts the genetic stock portfolio of Copper River salmon populations. Decreased genetic diversity weakens the overall sustainability of Copper River salmon and fails to provide for climate-resilient fisheries in the future. The failure of current management practices to ensure Copper River Chinook salmon return to spawn in numbers sufficient to reach the lower end of escapement goal in 4 of the last 10 years (2014-2023), despite lower the goal in 2021, lends additional supporting evidence for the board to adopt Proposal 51.

Sufficient numbers of early season salmon must be allowed to migrate unmolested to the uppermost reaches of the watershed ensure ample and diverse stock escapements and to provide reasonable opportunities for subsistence uses with a reasonable expectation of successful harvest. Interception of uppermost-bound Copper River salmon stocks disproportionately early in the commercial fishery season in recent years is increasingly impacting reasonable opportunities for subsistence fishing households upriver of Tonsina to have a reasonable expectation of success in harvesting salmon pursuant to AS 16.05.258. While the ANS range for subsistence salmon harvests in the lowest reach of the Glennallen Subdistrict from the bridge to Tonsina has been met each year since 2006 (Figure 1), subsistence salmon harvests in the middle and upper reaches of the Copper River have not reached the lower limits of the ANS ranges since 2015, upriver of Gakona, nor since 2018, downriver of Gakona to the mouth of the Tonsina River (Figures 2 and 3). Subsistence salmon harvests in the uppermost reach of the Copper River have fallen below the lower limit of the ANS of 12,000 salmon in all years since the BOF established it (effective in 2006) except in 2014 and 2015.

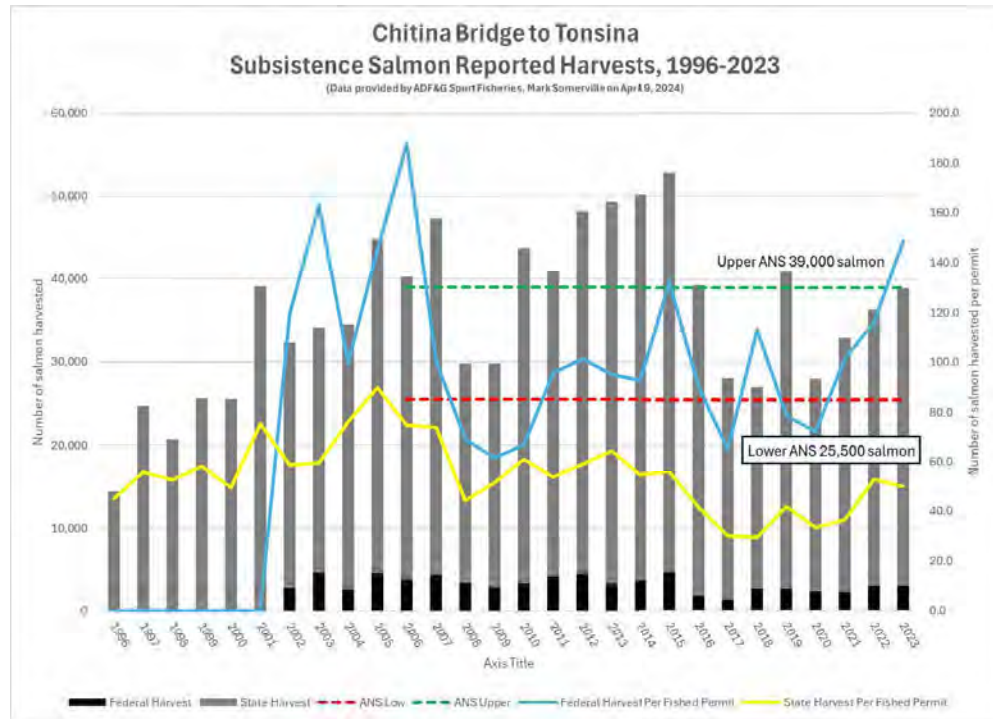


Figure 1. Amounts reasonably necessary for subsistence uses assessment on that portion of the Glennallen Subdistrict from the Chitina-McCarthy Bridge upriver to the mouth of the Tonsina River.

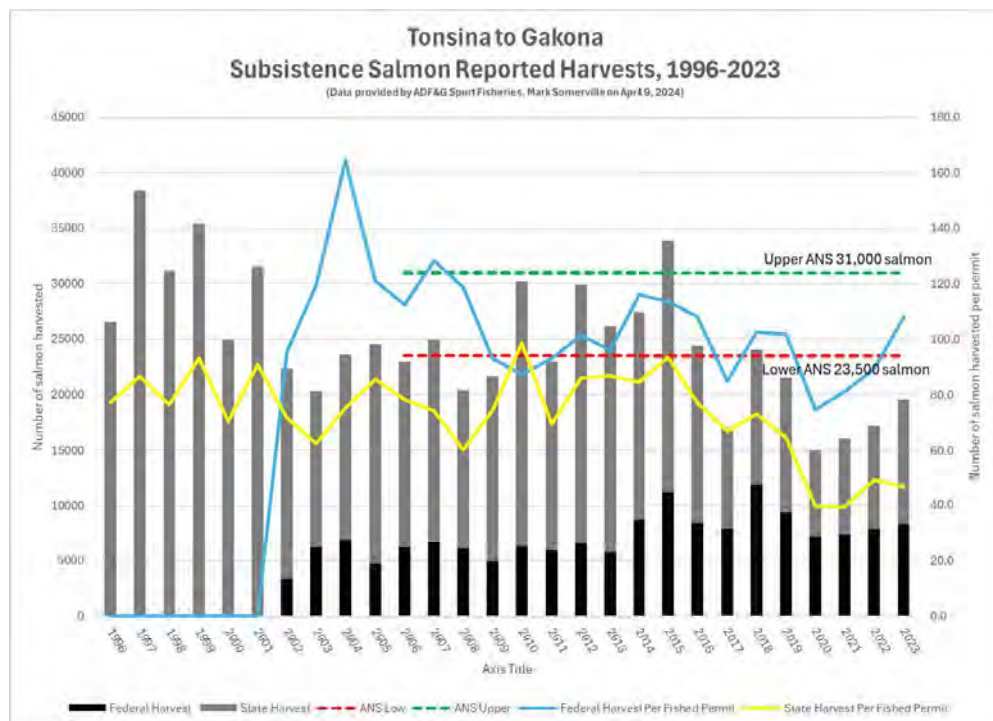


Figure 2. Amounts reasonably necessary for subsistence uses assessment on that portion of the Glennallen Subdistrict from the mouth of the Tonsina River upriver to the mouth of the Gakona River.

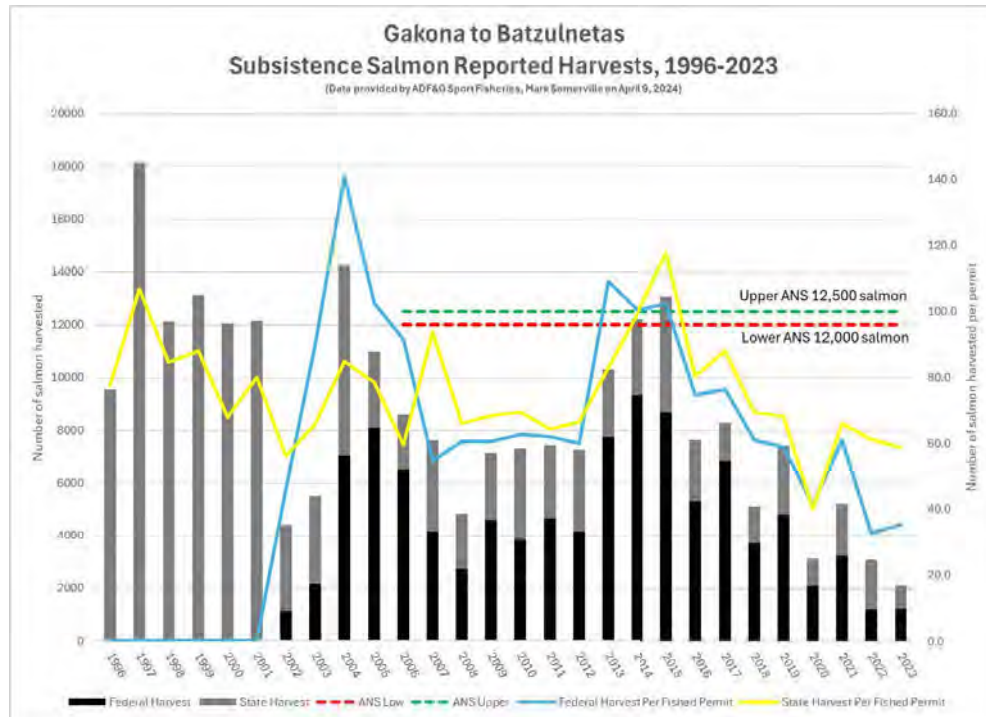


Figure 3. Amounts reasonably necessary for subsistence uses assessment on that portion of the Glennallen Subdistrict upriver from the mouth of the Gakona River, including Batzulnetas.

PROPOSAL 52

5 AAC 24.360. Copper River District Salmon Management Plan.

Reduce commercial salmon fishing opportunity in the Copper River District, as follows:

5 AAC 24.360 (x) Allow two Copper River District commercial salmon fisheries 12-hour openers during the week of May 15th, then delay openers by two weeks or until a daily management objective for fish passage is met at the Miles Lake Sonar.

AITRC supports proposals 51, 52, and 53 and while we submitted Proposal 52, we recommend the board adopt Proposal 51 based upon the significant analytical justification provided by NPS and recommend the board take no action on proposals 52 and 53. See AITRC's full comments on Proposal 51.

PROPOSAL 53

5 AAC 24.360 Copper River District Management Plan.

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, as follows:

Allow commercial fisheries to open for the first two openers as a test fishery, then close until the Copper River cumulative management objective is met.

AITRC supports proposals 51, 52, and 53; however, we recommend the board adopt Proposal 51 based upon the significant analytical justification provided by NPS and recommend the board take no action on proposals 52 and 53. See AITRC's full comments on Proposal 51.

PROPOSAL 54**5 AAC 24.361. Copper River King Salmon Management Plan.**

Restrict use of Copper River District inside closure area during statistical weeks 20 and 21, as follows:

(b) In the commercial fishery, during the statistical weeks 20 and 21, the commissioner may not close [open] more than three [ONE] 12-hour fishing periods within the inside closure area of the Copper River District described in 5 AAC 24.350(1)(B).

AITRC opposes Proposal 54. The commissioner should be able to close the fishery at any time to ensure sustainability and the sharing of the burden of conservation consistent with the sustainable salmon fisheries management policy (5 AAC 39.222). Statistical weeks 20 and 21 comprise the majority of the Chinook salmon catch in the fishery. During this time of concern for the Copper River Chinook salmon, there should be no liberalization of commercial fishing in the Copper River district inside the closure area.

PROPOSAL 55**5 AAC 24.361. Copper River King Salmon Management Plan and**

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted, as follows:

If the commercial fishery is closed for king conservation measures on the inside waters during the commercial season for more than two consecutive non-mandatory inside closures then the commercial guide services in the Upper Copper River drainage will be limited to at least one conservation measure listed below for a period of no less than one week.

AITRC opposes Proposal 55. Restriction of the commercial fishery in the Copper River District may be necessary for salmon conservation purposes, especially for Copper River Chinook salmon, and to reach the inriver goal as assessed by Miles Lake Sonar. The policy for the management of sustainable salmon fisheries requires that the burden of conservation be shared among all fisheries in close proportion to each fisheries' respective use. If the inriver goal is achieved, there should be no reason to restrict sport fishing guiding services in the Upper Copper River District.

PROPOSAL 58**5 AAC 24.361. Copper River King Salmon Management Plan.**

Amend the Copper River King Salmon Management Plan, as follows:

5 AAC 24.361(d) is amended to read:

...

- (d) In the Chitina Subdistrict personal use dipnet salmon fishery,
(3) if the commissioner projects that the upper bound of the escapement goal will be exceeded, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dipnet salmon fishery season and immediately reopen a season during which the king salmon annual limit per household permit is increased.

AITRC opposes Proposal 58. From 2014 to 2023, the Chitina Subdistrict Personal Use (PU) dipnet fishery exceeded the board’s PU allocation in 7 of the past 10 years with a 10-yr average harvest of 151,895 salmon (data provided by ADF&G’s Mark Somerville on April 19, 2024). The impacts of this trend to upriver priority subsistence users of Copper River Chinook and sockeye salmon must be considered given indicators suggesting that the existing Copper River salmon-related management plans no longer provide reasonable opportunities for customary and traditional subsistence uses upriver from the mouth of the Tonsina River.

The PU harvest in 2019, for example, was 179,795 fish, whereas the Glennallen Subdistrict and Batzulnetas subsistence salmon harvest upriver from the mouth of the Tonsina River fell below the lower limits of the amounts reasonably necessary for subsistence (ANS) combined by more than 6,500 salmon. Fish harvested downriver cannot be harvested upriver. Furthermore, if adopted at this meeting, ADF&G’s Proposal 58 would further increase the allocation of salmon to the PU fishery in Chitina, which would undoubtedly further challenge reasonable opportunities for subsistence uses of salmon upriver from Tonsina.

Despite lowering the minimum Chinook salmon escapement goal in 2021 and establishing a range of 21,000 to 31,000 Chinook salmon, escapement has not met the lower bound SEG in 4 out of the last 10 years (2014-2023). Subsistence salmon harvests in the Glennallen Subdistrict upriver of the mouth of the Tonsina River have not reached the lower limits of the ANS findings established by the board since 2018 in that portion of the river from Tonsina to the mouth of Gakona River, nor have subsistence harvests reached the lower limit of the ANS upriver of the Gakona River since 2015. Customary and traditional subsistence uses are not prioritized. When subsistence needs continue to go unmet, and especially in times of low Chinook salmon abundance where minimum escapements are not achieved, there should be no liberalization of non-subsistence fisheries.

The board established in regulation 5 AAC 77.001(B) that “it is the intent of the board that the taking of fish under 5 AAC 77.001 will be allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest.” If Proposal 58 had been in place, the department likely would have increased the PU bag limit for Chinook salmon in six out of the last ten years given the estimated Chinook escapement reportedly exceeded the upper bound of the 31,000 Chinook salmon. It is important to recall that the current subtraction method of estimating escapement over-estimates the numbers of salmon that reach the spawning grounds based upon local and traditional knowledge of subsistence fishing households and Ahtna subject matter experts in the upper reaches of the Copper River. Further increasing the salmon harvest in the PU fishery as proposed by the department in Proposal 58, which has already experienced increased fishery participation given restrictions to other salmon fisheries across Alaska, would likely further challenge reasonable opportunities for subsistence uses and meeting the lower bound of the Chinook salmon escapement goal.

PROPOSAL 59**5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan, as follows:

5 AAC 77.591(e) is amended to read:

...

- (e) The total annual limit for each personal use salmon fishing permit is **as follows:**
(1) 25 salmon for the head of household and 10 salmon for each dependent of the permit holder, except that only one king salmon may be retained per household[.];
(2) if the commissioner projects that the upper bound of the Copper River drainage sockeye salmon sustainable escapement goal will be exceeded, the commissioner may, by emergency order, close the Chitina Subdistrict personal use dip net salmon fishery season and immediately reopen a season during which the annual limit for the head of household is increased by XX sockeye salmon with no increase in the king salmon annual limit established in 5 AAC 77.591(e)(1), or an increase in the king salmon annual limit by conditions specified in 5 AAC 24.361(d).

AITRC opposes Proposal 59. From 2014 to 2023, the Chitina Subdistrict Personal Use (PU) dipnet fishery exceeded the board's PU allocation in 7 of the past 10 years with a 10-yr average harvest of 151,895 salmon (data provided by ADF&G's Mark Somerville on April 19, 2024). The impacts of this trend to upriver priority subsistence users of Copper River salmon must be considered given indicators suggesting that the existing Copper River salmon-related management plans no longer provide reasonable opportunities for customary and traditional subsistence uses upriver from the mouth of the Tonsina River.

The PU harvest in 2019, for example, was 179,795 fish, whereas the Glennallen Subdistrict and Batzulnetas subsistence salmon harvest upriver from the mouth of the Tonsina River fell below the lower limits of the amounts reasonably necessary for subsistence (ANS) combined by more than 6,500 salmon. Fish harvested downriver cannot be harvested upriver. Furthermore, if adopted at this meeting, ADF&G's Proposal 59 would further increase the allocation of salmon to the PU fishery in Chitina, which would undoubtedly further challenge reasonable opportunities for subsistence uses of salmon upriver from Tonsina.

Subsistence salmon harvests in the Glennallen Subdistrict upriver of the mouth of the Tonsina River have not reached the lower limits of the ANS findings established by the board since 2018 in that portion of the river from Tonsina to the mouth of Gakona River, nor have subsistence harvests reached the lower limit of the ANS upriver of the Gakona River since 2015. Customary and traditional subsistence uses are not prioritized.

The board established in regulation 5 AAC 77.001(B) that "it is the intent of the board that the taking of fish under 5 AAC 77.001 will be allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest." When subsistence needs continue to go unmet, there should be no liberalization of non-subsistence fisheries. It is important to recall that the current subtraction method of estimating escapement over-estimates the numbers of salmon that reach the spawning

grounds based upon local and traditional knowledge of subsistence fishing households and Ahtna subject matter experts in the upper reaches of the Copper River. Further increasing the salmon harvest in the PU fishery as proposed by the department in Proposal 59, which has already experienced increased fishery participation given restrictions to other salmon fisheries across Alaska, would likely further challenge reasonable opportunities for subsistence uses.

Additional fishing opportunities in the Chitina PU fishery by increasing the bag limit of sockeye or Chinook salmon could further harm Chinook salmon, even if retention is not allowed. Additional sockeye fishing in the CSD will inevitably result in the incidental catch of Chinook salmon. AITRC staff has witnessed many unsuccessful attempts to release Chinook salmon in the Chitina Subdistrict due to the inherently dangerous style of dipnet fishing. AITRC contends that many Chinook that are released die due to incidental mortality associated with poor fish handling and during catch and release efforts.

AITRC is also opposed to Proposal 59’s authority to increase the PU bag limit for Chinook salmon as detailed in our comments for Proposal 58.

PROPOSAL 60

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Modify the annual limit for the Chitina Subdistrict, as follows:

Section 5 AAC 77.591(e) The total annual limit for each personal use salmon fishing permit is 20[25] salmon for the head of household and 5 [10] salmon for each dependent of the permit holder, except that only one king salmon may be retained per household.

AITRC supports 60. From 2014 to 2023, the Chitina Subdistrict Personal Use (PU) dipnet fishery exceeded the board’s PU allocation in 7 of the past 10 years with a 10-yr average harvest of 151,895 salmon (data provided by ADF&G’s Mark Somerville on April 19, 2024). The impacts of this trend to upriver priority subsistence users of Copper River salmon must be considered given indicators suggesting that the existing Copper River salmon-related management plans no longer provide reasonable opportunities for customary and traditional subsistence uses upriver from the mouth of the Tonsina River.

Partially due to fisheries closures around the state, Chitina Subdistrict personal use fishery participation has been growing. As one of Alaskans' last strongholds of salmon, management should account for this increased pressure and not continue with current bag limits. Salmon harvested in the Chitina Subdistrict cannot be harvested upriver in priority subsistence fisheries. This negatively impacts upriver subsistence fishing, which should be a priority for management given ANS determinations upriver of the Tonsina River in the Glennallen Subdistrict are routinely not being met.

PROPOSAL 61

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan

(e) The total annual limit for each personal use salmon fishing permit is [25] **15** salmon for the head of household and 10 salmon for each dependent of the permit holder, except that only one king salmon may be retained per household. **Supplemental permits for an additional 10 salmon for head of household will be allotted by EO authority if the in-river goal has a harvestable surplus.**

AITRC supports Proposal 61 but recommends the board instead adopt Proposal 60. See AITRC comments for Proposal 60.

PROPOSAL 63

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Amend the opening date of the Chitina Subdistrict personal use fishery, as follows:

5 AAC 77.591 (b) Salmon may be taken from June **21** [7] or **2 weeks after a daily management of fish passage is met at Miles Lake sonar** through September 30. The commissioner shall establish a preseason schedule, including fishing times, for the period June **21** [7] through August 31 based on daily projected sonar counts at the sonar counter located near Miles Lake. This abundance-based preseason schedule will distribute the harvest throughout the season. The commissioner **must** [MAY] close, by an emergency order effective June **21** [7], the Chitina Subdistrict personal use salmon fishing season and shall reopen the season, by emergency order, on or before June **21** [15] depending on the run strength and timing of the sockeye salmon run. Adjustments shall be made to the preseason schedule based on actual sonar counts compared to projected counts. If the actual sonar count at Miles Lake is more than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which additional fishing times will be allowed. If the actual sonar count at Miles Lake is less than the projected sonar count, the commissioner shall close, by emergency order, the season and immediately reopen it during which fishing times will be reduced by a corresponding amount of time.

AITRC supports Proposal 63 for reasons provided within the proposal justification. Local and traditional knowledge and western science have confirmed a delayed shift in run-timing in recent years. This proposal would allow more early run fish to escape fisheries and help protect genetic diversity of those early season stocks (and species) disproportionately impacted under the current regime.

Subsistence salmon harvests in the Glennallen Subdistrict upriver of the mouth of the Tonsina River have not reached the lower limits of the ANS findings established by the board since 2018 in that portion of the river from Tonsina to the mouth of Gakona River, nor have subsistence harvests reached the lower limit of the ANS upriver of the Gakona River since 2015. Customary and traditional subsistence uses are not prioritized. Delaying the opening of the Chitina Subdistrict Personal Use fishery is an appropriate management measure to ensure reasonable opportunities for customary and traditional uses upriver in the Glennallen Subdistrict.

If Proposal 51 (to more conservatively manage commercial early season fisheries) were to be adopted, the Personal Use fishery may be able to open earlier than the historical June 7th – 15th start date as daily management objectives at the Miles Lake sonar will most likely be met earlier.

PROPOSAL 64

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year, as follows:

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan

(a) Salmon may be taken in the Chitina Subdistrict only under the authority of a Chitina Subdistrict personal use salmon fishing permit. Only one Chitina Subdistrict personal use salmon fishing permit may be issued to a household per calendar year. A household may not be issued both a Copper River subsistence salmon fishing permit and a Chitina Subdistrict personal use salmon fishing permit. **A household may not be issued a Chitina Subdistrict personal use salmon fishing permit if the household has been issued an Upper Cook Inlet personal use salmon fishing permit in the same calendar year.**

AITRC supports Proposal 64. With no in-season reporting requirements, and ability to obtain multiple permits, current regulation's bag limits are not enforceable. This proposed change would help to ensure that fishermen aren't "double-dipping" in the state's Personal Use Fisheries, and potential underestimation of harvest by managers. ADF&G data demonstrate that approximately 900 to more than 1,000 households participate in both Upper Cook Inlet and Chitina personal use fisheries and essentially have a double household bag limit is concerning given that upriver subsistence salmon harvests in the Glennallen Subdistrict above the mouth of the Tonsina River have not been meeting the lower limits of the ANS since 2018 upriver from Tonsina to the mouth of the Gakona River and since 2015 above Gakona.

PROPOSAL 65

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Require a weekly permit and in-season reporting in the Chitina Subdistrict, as follows: 5 AAC 77.591 **(x)**

A participant must purchase a one-week Personal Use dipnet permit from Alaska Department of Fish & Game. Reporting is required within one week of the expiration of the permit. If harvest bag limit is not reached, additional permits may be obtained upon satisfying reporting requirements.

AITRC supports Proposal 65. The proposal would provide more accurate in-season data for management use. Managers should strive to have more available "tools in the toolbox" to help refine methods to ensure sustainable escapement. This proposal would not only provide managers with an in-season reporting tool, it would also make bag limits easily enforceable and (as written) could potentially provide ADF&G income to help with said management and enforcement.

PROPOSAL 66**5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal, as follows:

5 AAC 77.591 Add subsection (i) as written

(i) The department, in consultation with the hatchery operator, shall manage the Chitina Subdistrict Personal Use salmon fishing through restricting time and area by emergency order to achieve the Gulkana Brood Stock escapement goal.

AITRC is neutral on Proposal 66 due to the impracticability of managing the personal use fishery using otolith collection to identify the hatchery component of the run. AITRC also understands that the Native Village of Eyak and ADF&G telemetry studies only identify Gulkana salmon stock but does not distinguish between hatchery and wild Gulkana salmon stocks. This proposal also appears to be impracticable because hatchery broodstock collection takes place six weeks after the fish were in the Chitina Subdistrict.

PROPOSAL 67**5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict, as follows:

Add 5 AAC 77.591 (c) **(1)**

(c) Salmon may be taken only with dip nets.

(1) King salmon intended or required to be released may not be removed from the water.

AITRC supports Proposal 67. AITRC contends that catch and release of Chinook salmon is largely unsuccessful in Chitina Dipnet Fishery based upon observations of AITRC staff. Incidental mortality associated with catch and release also is unaccounted for in Copper River salmon management. There are many accounts of dozens of Chinook being caught by individuals in a day (or hours) and releasing them unsuccessfully. The difficulty of releasing large Chinook is apparent, but smaller fish are potentially even more susceptible as they gill themselves in the mesh of dipnets. There is not really a good solution for successfully releasing Chinook salmon from dipnets, other than not catching them in the first place, or potentially limiting mesh size or the material from which nets are made, as proposed during the last regulatory cycle. While these changes may reduce gilling of released salmon, with increased surface area they may increase the difficulty in fishing for stationary, shore-based fishermen in swift waters of the canyon. As a result, AITRC supports this proposal to conserve Copper River Chinook salmon in the growing personal use fishery, reduce incidental catch inriver mortality, and ensure successful Chinook salmon passage upriver for spawning and priority subsistence uses.

PROPOSAL 68**5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Prohibit dipnetting from a boat in the Chitina Subdistrict, as follows:

5 AAC 77.591 (c) Salmon may be taken only with dip nets **while not in a boat.**

AITRC supports Proposal 68. Dip-netting from a boat is more efficient than from shore as it is a viable method for targeting salmon seeking refuge in times of high water, specifically Chinook, in inaccessible eddies from shore. The already crowded Chitina personal use fishery is growing in participation due to closures elsewhere around the state. The number of fish caught in this fishery must be limited by some means to allow fish to pass upriver for subsistence fishermen's access and to spawn. Upriver ANS findings established by the board to assess whether reasonable opportunities for subsistence uses have routinely not been met upriver of the Tonsina River. Prohibiting dip-netting from a boat in the Chitina Subdistrict would allow more fish upriver to provide more reasonable opportunities for subsistence fishing households to have a reasonable expectation of success in harvesting Copper River salmon.

PROPOSAL 69**5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Establish restrictions when dipnetting from a boat in the Chitina Subdistrict, as follows:

(C) Salmon may be taken only with dip nets. **Salmon taken with a dipnet from a powerboat will be subject to more time and area restrictions to allow fish passage to return to a pattern that more closely resembles past practices in the fishery.**

AITRC supports Proposal 69 for reasons outlined in AITRC comments for Proposal 68, which we prefer.

PROPOSAL 70**5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.**

Extend the lower boundary of the Chitina Subdistrict, as follows:

The Chitina Dipnetters Assn. is requesting the BOF extend the lower boundary of the Chitina Personal Use Dipnet Fishery with new language in 5AAC 77.591(h) as defined below.

For the purpose of this section, the Chitina Subdistrict consists of all waters of the mainstream Copper River from the downstream edge of the Chitina-McCarthy Bridge downstream **to a line crossing the Copper River from a point just upstream of Canyon Creek on the east (lat. 61 deg 24'36.00"N – lon. 144 deg. 28'25.34"W) angling across the Copper River to the existing lower limit sign at Haley Creek** [to an east west line crossing the Copper River approximately 200 yds. Upstream of Haley Creek]

AITRC opposes Proposal 70. Proposed in 2017, 2021, and now again in 2024 by the Chitina Dipnetters' Association (CDA), this regulatory change would extend the Personal Use fishery downriver to Canyon Creek. Proposal 70 correctly points out that "drift dipnetting from both personal and guided boats has substantially increased as a method of harvesting salmon in the CPUDF." The proposal attributes this increase to the fact that there is a limited number of

suitable sites for shore-based dipnetting, and similarly points out that personal use fishing households who dipnet from boats are constrained to very small “productive areas”—primarily between the mouth of Wood Canyon and the regulatory marker at Hailey Creek.

All of these assertions highlight the fact that there is crowding at personal use dipnet sites on shore, one indicator of the immense pressure on the resource resulting from this expanding fishery, which continues to increase as salmon fisheries in others areas of the state are severely restricted or closed. While extending the regulatory boundary nearly a half mile downriver on the East bank may provide some temporary relief from this congestion, AITRC contends that fishing pressure will continue to build; however, the Copper River cannot feed the entire state. AITRC is concerned that further expanding the personal use fishery by increasing the size of the fishing area to accommodate an increasing number of users would set a dangerous precedent that would further challenge the ability of subsistence fishing households in the Glennallen Subdistrict to have reasonable opportunity for customary and traditional subsistence uses.

Previous efforts by the proponent to expand the PU fishery included Proposal 17 during the 2017 board regulatory cycle would have extended the PU fishery area downriver to the mouth of the Ulanatna River, and then again in 2021 with Proposal 18. Proposal 70 proposes expanding the PU fishery to an area smaller than during the last regulatory cycle; however, AITRC remains opposed to any expansion of the Chitina dipnet fishery due to the lack of reasonable opportunities for priority subsistence uses of salmon upriver of the Tonsina River in the Glennallen Subdistrict.

Copper River Chinook salmon are in a period of low abundance. Despite lowering the escapement goal at the previous board cycle in 2021, Chinook have failed to meet the lower bound of the SEG 4 out of the last 10 years (2014-2023). Every effort should be taken to conserve Chinook stocks and prevent them from further declining and failing to meet escapement goals. Although total annual Chinook retention reported in the personal-use fishery has been relatively small (generally in the range of 1,000 – 3,000 per year, according to information on the ADF&G website), incidental mortality resulting from dipnet catch-and-release is poorly understood and not accounted for by managers. Because this proposal is likely to increase fishing effort in an area where Chinook salmon migrate, it is likely to increase inriver Chinook mortality. Because Copper River salmon management primarily focuses on sockeye, it may not be as responsive to further signs of trouble in Chinook salmon.

Changes in access to the Chitina PU fishery are likely to further strain the resource. The Alaska Department of Transportation recently improved the road from O’Brien Creek to Haley Creek. This will make motorized access by dipnetters far more efficient along this reach of river. Despite the limited number of onshore sites pointed out in this proposal, we expect that the improved road will already significantly increase fishing effort during the fishing season.

The area below the current lower boundary of the personal-use fishery is one of the most dangerous parts of the Copper River, particularly during high water. There is a large whirlpool immediately below the current regulatory boundary that presents a significant hazard for boaters, especially those with smaller boats and motors.

Finally, and most importantly, Haley Creek is the lower boundary of the upper Copper River District. It is possible that extending the boundary downriver, below the current regulatory marker, would effectively create another new fishery in the Lower Copper River District. This would potentially open the floodgates to further expansion of the personal-use fishery into lower reaches of the river - a serious conservation concern given the current state of salmon stocks and the lack of reasonable opportunities for subsistence upriver of Tonsina.

PROPOSAL 71

5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Prohibit guiding in the Chitina Subdistrict, as follows:

5 AAC 01.620(x) Fishing guide services are prohibited in the Copper River Chitina Subdistrict Personal Use Fishery.

(x) "fishing guide services" means assistance, for compensation or with the intent to receive compensation, to a Personal Use Fishery participant to take or to attempt to take fish from a vessel by accompanying or physically directing the Personal Use Fishery participant in fishing activities during any part of a fishing trip.

AITRC supports Proposal 71. The personal use fishery has grown in popularity due to closures around the state. This fishery is allotted 150,000 salmon which may be exceeded in times of excess inriver abundance. The estimate of salmon that are reaching the spawning grounds are not reflective of these “times of excess.” Participation and harvest in the Chitina Subdistrict are increasing despite the subsistence harvest consistently falling below the lower limits of the board-determined ANS ranges upstream of Tonsina River. Prohibiting commercial guide services would likely decrease the amount of harvest in the personal use fishery and allow more fish upriver to provide reasonable opportunity for subsistence uses. We ask the Board to consider the video shown to them during the 2021 cycle showing a guided fisherman in the CSD who expressed his uncertainty with what he was going to do with all the salmon he harvested (RC 091 by Dennis Zadra for 2021 Proposal 7). To further demonstrate excessive take in this fishery, we regularly witness “marketplace” postings on social media in the spring of Personal Use fishers giving away last year’s catch before throwing it out to resume taking more. It is the intent of the board that the taking of fish under 5AAC 77.001(b) will be allowed when that taking does not jeopardize the sustained yield of a resource and either does not negatively impact an existing resource use or is in the broad public interest. Reasonable opportunities for subsistence fishing households to have a reasonable expectation of successfully harvesting salmon consistent with AS 16.05.258(f) must be prioritized.

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.

Close sport fishing for salmon based on water temperature in the Gulkana River, as follows:

5AAC 52.023 (9)(x) Close Gulkana River to fishing for Chinook and sockeye salmon by emergency order when water temperature at the Sourdough station exceeds 18 degrees Celsius (C) at any time during a 24-hour period for 3 consecutive days or exceeds 20

degrees C. Fishing may resume when stream temperature recedes and does not reach 18 degrees C at any time for 2 consecutive days.

AITRC supports Proposal 72 with amended language to read “before July 19th” as this is the closure date for fishing for Chinook salmon. This clarification of language would help to protect Chinook salmon, while allowing for harvesting of sockeye salmon and release of incidentally caught Chinook after July 19. The chart below describes the closures that would have occurred since 2018 if this rule with amended language was in effect.

Based on radio telemetry, the Gulkana River between 2019 and 2021 accounted for approximately 25% of returning Copper River Chinook which is three times higher than the next highest contributing stock at 8%. Of the 4,500 to 6,500 Chinook returning to the Gulkana system, it is estimated that 60% spawn above the Gulkana counting tower and 40% spawn below. Sport fishing for Chinook largely targets the reach from Sourdough upstream to the counting tower and is primarily accessed via jet boat. This part of the river is relatively slow moving with deep pools, riffles, and runs. Chinook can be observed spawning in shallow tail-outs and seeking refuge in deeper pools, especially upstream of the confluence of the West Fork where the water is very clear due to it being uniquely (to the Copper River Basin) a precipitation driven, non-glacial system.

The Gulkana River is one of the last good clearwater sport fisheries for Chinook salmon in the state. Due to low abundance and closures in other systems, many Alaskans and non-residents utilize this fishery. We have seen an increase in fishing pressure and expect the trend to continue with increased pressure from guides from around the state. The idea of this proposal is to have a (mandatory) tool on hand to ensure fish that make the long journey back to river can be protected to time of spawn during times of unfavorable environmental conditions. The Gulkana River is relatively easily accessible from the road system, and we want to discourage the disturbance of spawning salmon by fisherman including fish handling incidental mortality associated with catch and release when environmental factors are unfavorable and amplify effects of heat stress.

The reason the daily maximum temperature at the USGS Sourdough station was chosen instead of the daily mean temperature is strictly for ease of monitoring and enforcement. At research stations, such as the Andreafsky weir, handling of fish is suspended above a mean daily temperature of 17 degrees Celsius. This proposal is written with the generally accepted threshold of a daily maximum of 18 degrees, and 20 degrees Celsius (von Biela et al. 2020). Diurnal fluctuation in this system is approximately up to 2 degrees resulting of a mean temperature right around the established 17 degrees. Even though there are deep pools where temperatures are cooler, this only leads to targeting fishing efforts to only areas of refuge during these hotter conditions. This is partially the rational for fisheries around the United States regulating efforts above temperature thresholds, ie. “hoot owl fisheries” only opened at night. Keep in mind diurnal fluctuations in the lower 48 are typically more variable given shorter daylight hours during fishing seasons, so this isn’t really an option on the Gulkana River.

Chinook are in a period of low abundance (2024 escapement). Of the fish that make the long journey upriver to spawn, we want to see every measure possible taken to responsibly manage for future replacement. Large female Chinook, the most important individuals for successful

spawner-recruit, are approximately two times as susceptible to prespawn mortality due to heat stress (Hinch et al. 2021).

AITRC is part of the statewide temperature monitoring program. We have approximately 125 remote sensing temperature loggers deployed in the Gulkana system alone, and more around the Copper River basin. Witnessing 2019's extraordinarily high temperatures, mass prespawn mortality, and failing to see evidence of that brood year's (5-year old component) return in this year's inriver abundance led us to develop this proposal. We are entering a time in the Copper River watershed when we have more data collection and analysis than ever before, and it is irresponsible to not use what we have for better management.

PROPOSAL 78

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

Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%, as follows:

The solution is very simple. Reduce the permitted egg intake of each Prince William Sound Hatchery that produces pink and chum salmon by 25%. Then do an evaluation within five years.

AITRC supports Proposal 78. Sockeye salmon are decreasing in size with increased hatchery pink competition in the ocean (Rand and Ruggerone 2024, Ohlberger et al. 2023). This has been evident to Ahtna elders for years, and now it has been "validated" by western science. Smaller individual fish leads to less pounds harvested, egg capacity for replacement, and overall fitness. The "subtraction" method of assessing escapement does not account for decreased body size, egg quantity and quality, and energetics, or fitness to reach spawning grounds, nor are they considering increased inriver mortality, compounded by changing environmental conditions.

PROPOSAL 89

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.

Increase the bag and possession limit for burbot in Lake Louise, as follows:

5 AAC 52.023(13)(C) is amended to read:

(A) the bag and possession limit for burbot is two [ONE] fish, with no size limit;

AITRC supports Proposal 89. This will simplify regulations by aligning with the rest of the drainage.

PROPOSAL 90

5 AAC 52.023. Special provisions for seasons, bag, possession, annual, and size limits, and methods and means for the Upper Copper River and Upper Susitna River Area.

Modify bag and possession limits of burbot in Crosswind Lake, as follows:

To mimic the Tyone River Drainage regulations, which has a bag/possession limit of 2 burbot per person per day.

AITRC opposes Proposal 90. There is no biological concern or current data to warrant this change.

PROPOSAL 91

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.

Modify seasons, bag, possession, and size limits for Arctic grayling in Mendeltna Creek, Moose Lake, and Our Creek, as follows:

5 AAC 52.023 (14), (15), and (17) are amended to read:

...

(14) in Mendeltna Creek drainage,

(A) in all flowing waters, including all waters within one-quarter mile of Mendeltna Creek's confluence with Tazlina Lake,

(i) Sport fishing for salmon is closed; salmon may not be taken or possessed;

(ii) **repealed** [ARCTIC GRAYLING MAY BE TAKEN ONLY FROM JUNE 1 – MARCH 31, WITH A BAG AND POSSESSION LIMIT OF TWO FISH, WHICH MUST BE GREATER THAN 12 INCHES IN LENGTH];

(15) in Moose Lake,

(C) **repealed** [ARCTIC GRAYLING MAY BE TAKEN ONLY FROM JUNE 1 – MARCH 31, WITH A BAG AND POSSESSION LIMIT OF TWO FISH];

(17) in Our Creek,

(A) **repealed** [ARCTIC GRAYLING MAY BE TAKEN ONLY FROM JUNE 1 – MARCH 31, WITH A BAG AND POSSESSION LIMIT OF TWO FISH];

AITRC supports Proposal 91. There appears to be no biological reason for these fisheries restrictions to remain in place.

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Our Culture Unites us; Our Land Sustains us; Our People are Prosperous

November 26, 2024

To members of the Alaska Board of Fisheries:

On behalf of the shareholders of Ahtna, Incorporated ("Ahtna"), we are submitting the following comments on select proposals in the Board of Fisheries 2024/2025 Meeting Cycle Proposal Book.

PROPOSAL 48 – 5 AAC 01.620. Lawful gear and gear specifications.

Ahtna opposes this proposal. This proposal does not provide clear justification as to why the Board would overturn its decision in 2021 to adopt regulations banning permit holders from fishing from a guided boat. Further, "Subsistence uses means' the noncommercial, customary and traditional uses of wild, renewable resources...." AS 16.05.940(36). We believe that using commercial guiding services in a subsistence fishery is a direct violation of Title 16. Finally, we are concerned that this will cause competition for other subsistence users in the Glennallen Subdistrict subsistence ("GSD") fishery and other upstream users. We are also concerned this will have a negative impact on escapement.

PROPOSAL 49 – 5 AAC 01.620. Lawful gear and gear specifications.

Ahtna opposes this proposal. "Subsistence uses means' the noncommercial, customary and traditional uses of wild, renewable resources...." AS 16.05.940(36). We believe that using commercial transportation services in a subsistence fishery is a direct violation of Title 16.

PROPOSALS 51, 52, and 53 – 5 AAC 24.360. Copper River District Management Plan.

Ahtna supports these proposals. We agree that the management of the Copper River District commercial fishery by the Alaska Department of Fish and Game ("Department") has resulted in disproportionately high harvest rates for early run Copper River salmon. Without intervention from the Board to address this issue, we will likely see a reduced overall population diversity of Copper River sockeye and king salmon. Finally, we are very concerned about the disproportionate impact that these management decisions have had on our users fishing upstream of the Gulkana River in the upper portion of the GSD.

PROPOSAL 54 – 5 AAC 24.361. Copper River King Salmon Management Plan.

Ahtna opposes this proposal. We agree with the Department that Inside-waters closures are a key tool to conserve Copper River king salmon. Limiting these closures will have a detrimental impact on the Copper River king salmon population.

PROPOSAL 58 – 5 AAC 24.361. Copper River King Salmon Management Plan.

Ahtna opposes this proposal. We are concerned that the liberalized management of the Copper River king salmon based on escapement projections could have a significant negative impact of the overall escapement of Copper River king salmon. We are also concerned about the impact to upriver subsistence users.

PROPOSAL 59 – 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Ahtna opposes this proposal. We are concerned that the liberalized management of the Copper River sockeye salmon based on escapement projections could have a significant negative impact of the overall escapement of Copper River sockeye salmon. We are also concerned about the impact to upriver subsistence users.

PROPOSAL 63 – 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Ahtna supports this proposal. We agree that this will increase the number of salmon passing through the Chitina Subdistrict and provide additional fish for the upriver fisheries. We also agree that this will increase spawning escapement.

PROPOSAL 68 – 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Ahtna supports this proposal. We feel that this will increase the number of salmon passing through the Chitina Subdistrict and provide additional fish for the upriver fisheries. We also feel that this will increase spawning escapement.

PROPOSAL 70 – 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Ahtna opposes this proposal. We do not feel that increasing the Chitina Subdistrict is necessary for the continued success of the Copper River Personal Use Dip Net Salmon Fishery. In addition, we agree with the Department that this will make enforcement of the boundaries more difficult and lead to confusion with the differing downstream boundaries between the state and federal fisheries.

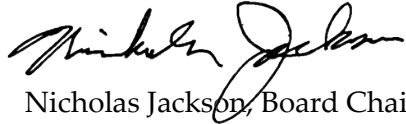
PROPOSAL 71 – 5 AAC 77.591. Copper River Personal Use Dip Net Salmon Fishery Management Plan.

Ahtna supports this proposal. We agree that guided fishing from a boat allows targeting of holding areas that are not accessible from shore and enhances ability to catch king salmon and sockeye salmon. We feel that this will increase the number of salmon passing through the Chitina Subdistrict and provide additional fish for the upriver fisheries and increase spawning escapement.

Alaska Board of Fisheries
November 26, 2024
Page 3

If you have any questions, please do not hesitate to contact us.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nicholas Jackson". The signature is fluid and cursive, with the first name "Nicholas" and last name "Jackson" clearly distinguishable.

Nicholas Jackson, Board Chair
Ahtna, Incorporated

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

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

Alaska Groundfish Data Bank (AGDB) is a member organization that includes all shorebased processors located in Kodiak and catcher vessels home ported in Kodiak. Our members participate in the Prince William Sound (PWS) Pelagic Pollock Trawl fishery annually and the Kodiak processors and vessels have long term dependency in the state managed fishery; not only did they pioneer the fishery, but they have also participated since the inception in 1995. All three of AGDB's staff are also Kodiak residents; I've lived here for 40 years, raised my family here, and my employees have planted roots here as well. Kodiak is one of the last truly fishery dependent, year round commercial fishing towns in Alaska. AGDB mission is maintaining sustainable GOA fisheries now and into the future and keeping Kodiak as a community whole.

Our members strongly oppose proposals 14, 15, 16 and 17.

Background

The Kodiak trawl fleet are primarily family owned businesses with some third and fourth generation families that now operate the vessels. Data available from the National Oceanic and Atmospheric Administration, Alaska Fishery Science Center, show that more than 50% of the revenue generated in the Gulf of Alaska (GOA) pollock fishery is harvested by vessels that are Alaskan owned¹. The majority of crew members on these vessels are also Alaskan residents. The PWS pollock fishery is a catcher vessel only fishery; most vessels are between 80 to 90 feet in length. All vessels that participate in the State pollock fishery are federally licensed and also participate in the GOA federal pollock fishery which only allows catcher vessels.

Kodiak has more shorebased processors than any other community in Alaska. The trawl sector delivers groundfish 10 to 11 months a year which allows for year round processing within our community. Our year round processing sector supports the highest percentage of local resident processing workers of any major seafood production area in Alaska.

According to an economic report commissioned by the Kodiak Island Borough (KIB), "the seafood industry is the most significant sector in terms of earnings and employment in the borough. The analysis of fisheries and other data indicates the seafood industry generated 3,200 jobs and \$200 million in labor income in 2019. Nonetheless, Kodiak is experiencing a long-term decline in fisheries participation and income, including both wage jobs (most notably seafood processing jobs) and self employment (fishermen)."² The KIB levies a severance tax, the city levies a sales tax, and both governments benefit from the State of Alaska Fishery Business Tax. Tax revenue data for 2023 shows fish severance tax revenue for all fish landings in the KIB generated \$1.5 million and State Fishery Business Tax generated

¹ Alaska Fishery Science Economic Staff (Nov 2024), Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska and Bering Sea/Aleutian Islands Area: Economic Status of the Groundfish Fisheries off Alaska, 2023, page 45.

² McDowell Group (2021). Kodiak Economic Profile and Pandemic Impact Analysis. Prepared for Kodiak Island Borough.

\$1.35 million³. These revenues directly benefit borough services. Similar tax amounts from the State Fishery Business Tax and sales tax are available to support city services.

Alaska's seafood industry continues to be in crisis statewide and Kodiak's fisheries are no exception. The industry continues to be under extreme stress which began during the Covid pandemic due to tariffs, rising fuel costs, supply chain issues, processing labor costs and currency exchange rates. The situation dramatically worsened in August 2023 with the collapse of global seafood markets across all species. Russia has declared economic war on US Seafood and continues to put large volumes of cheap salmon and whitefish on the global markets to fund their war in Ukraine. The glut of Russian seafood is expected to continue into 2025, as Russia has already announced an increase in their pollock quotas for next year, against their own scientific advice. All of these negative pressures have resulted in low ex-vessel and wholesale prices across virtually all seafood species. We are seeing changes in the Kodiak waterfront as a result and are concerned about both processor and vessel consolidation as the industry struggles through these unprecedented times.

PWS Pollock Fishery Management

The Alaska Department of Fish and Game (ADF&G or Department) has done a thorough job describing the management of the PWS pollock fishery in their staff report. As they point out, the fishery is heavily regulated and managed. The fleet and processors have developed strong collaboration to create effective real time communication between the Department and the industry. The fleet must check in and out of the fishery, report harvest including bycatch species to the department daily and typically only 6 - 8 vessels are allowed to fish in the Sound at any one time. Besides the 5% bycatch limit divided across the different species/ species groups and the pollock guideline harvest level (GHL), there is also a 60% limit for each bycatch species or species group and pollock harvest for each section. Table 1 below shows the more refined bycatch caps for the 2023 fishery and actual catch as an example.

Table 1. 2023 PWS Fishery Summary (all units are round lbs, including salmon)

Mgmt Section Totals	Pollock	Rockfish	Salmon	Shark	Squid	Other	Total Bycatch	Vessels
Hinchinbrook	4,287,979	11,248	392	599	47,489	1,242	60,970	15
Port Bainbridge	1,806,754	1,975	1,698	793	4,088	2,109	10,663	6
Knight Island	940,585	684	383	3	1,085	1,210	3,365	3
Total Harvest (lb)	7,035,318	13,907	2,473	1,395	52,662	4,561	74,998	19
Annual GHL/Cap	7,309,316	36,547	2,924	70,169	219,279	36,547	365,466	
Lbs Remaining	273,998	22,640	451	68,774	166,617	31,986	290,468	
% caught	96.25%	61.95%	84.58%	1.99%	24.02%	12.48%	20.52%	

The vessels are also required to retain all pollock, rockfish and salmon. All proceeds for pollock in excess of the 300,000 pound trip limit and rockfish above the incidental catch limit of 0.5% must be surrendered to the State. The salmon retained can not be sold but can be donated to Food Banks. For rockfishes taken as bycatch, the trawl fleet's catch is predominantly shorttraker rockfish and some roughey rockfish, not yelloweye rockfish

Vessel Operations

Ability to Discard Catch: Vessels haul back their net and dump their catches directly into their refrigerated sea water (RSW) tanks. One haul can be between 50,000 to 150,000 pounds of pollock catch. The staff comments indicate that on average between 759 individual rockfish and 888 individual salmon were caught annually between 2021 and 2023. This compares to an average pollock catch over the same time

³ Kodiak Island Borough 2023 Comprehensive Annual Financial Report.

frame of approximately 6 million pounds (or 3.4 million individual pollock assuming 1.75 pound average per fish). When comparing the number of individual rockfish or individual salmon to the number of individual pollock, the catch is just 0.012% rockfish and 0.026% salmon. Sorting through all those pollock to remove the few individual fishes of bycatch is not practical. This is why all the accounting of the catch is done at the processing plants at time of offload.

Bottom Contact: A pelagic net and all the components run from \$150,000 to \$250,000. The Sound is very deep ranging in depth from 150 to 250 fathoms. Acoustic back scatter for the vessel's electronics do not provide the details to "see" the bottom with enough confidence to touch the sea floor with their net. The bottom type in PWS is rocky gullies and trenches. Losing a net at the beginning of the fishing season would be disastrous for the vessel and its crew. The pollock fleet does not fish their pelagic nets on the bottom in PWS.

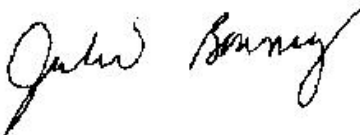
Monitoring: The majority of the Kodiak pollock fleet have electronic monitoring equipment on their vessels. They also carry at-sea observers when required within the federal fisheries. Developing a cost effective State observer/monitoring program for an average of 23 pollock trips annually would be difficult. As the Department suggests they have the authority to deploy onboard observers but do not have the authority to require electronic monitoring.

Unintended Consequences

Pollock are predators in the PWS Ecosystem. There have been several studies that show juvenile pink salmon survival is linked to the amount of adult pollock in the ecosystem within the Sound. Reducing pollock harvests will affect pink salmon survival which will in turn affect commercial salmon fisheries in the Sound. See Attachment 1 for a summary of research papers that show pollock consumption on pink salmon in PWS.

Not only are the actions described in Proposals 14, 15, 16, and 17 unwarranted, but they would cause real harm to Alaskans, including harvesters, processors and the community of Kodiak. We trust Department staff to continue managing the fishery as they have been and we concur with them that all four proposals should be rejected. Thank you for the opportunity to comment.

Sincerely,



Julie Bonney
Executive Director
Alaska Groundfish Data Bank

ATTACHMENT 1 - POLLOCK PREDATION 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.

Proposal #5. Support. Commercial fishing different gear types in specific areas of PWS to conserve both pelagic and nonpelagic rockfish during times of concern whether current harvest levels are sustainable is consistent with Article 8, Section 4. Interestingly the Department had the authority in regulation 5AAC 28.089 Guiding principles for groundfish fishery regulations before the BOF voted in 2008 to exempt PWS. In 2013 the entire regulation 5 AAC 28.089 was repealed.

Proposal #6. Support. Commercial fishing gear types that allow the implementation of Deepwater Release Mechanisms (DRM) should be codified in the PWS Rockfish Management Plan.

Proposal #14. Support. Sun events beyond the regulatory authority of the AK Board of Fisheries (BOF) may have caused a warming period in the North Pacific. The BOF can't do anything about that. The board can take actions to reduce the current strain on Alaska's coastal ecosystem out to 3 nautical miles offshore. Enforcing limits to gear types capable of coming into contact with the seafloor tough. All of PWS Inner District seafloor is critical habitat for the foods our membership gather annually. Every near shore returning chinook salmon, no matter how small, needs a chance to mate these days.

Proposal #16. Support. Rockfish bycatch on a trawler would most likely not benefit from DRMs onboard.

Proposal #27. Support. Department data has determined yelloweye rockfish harvest is unstable and closing the January -June season would reduce sport harvest enough to keep rockfish harvest at a stable level fine reduce Alaskan residents harvest along with nonresident anglers.

Proposal #29. Oppose. Passage of this Department proposal would delegate the authority of the BOF to allocate fishery resources under AS 16.05.251(a)(15). Regulating resident or non-resident sport fisherman as needed for the conservation, development and utilization of fishery resources over to the Department. AOC would rather the Department present a plan for reduction in yelloweye rockfish harvest in PWS among all users before the BOF.

Proposal #48. Support Strongly. This is a state subsistence fishery, AS 16.05.258, you have to be an Alaskan resident to participate. Whether you are a new resident wanting to participate in gathering your own fish harvest or an elder Alaskan who can't safely launch his own boat anymore a guide serves increases your safety and well as your changes to take home fish to eat.

Proposal #49 and #50. Oppose. Minimizing your risk of water travel and increasing your odds of going home with fish to eat need not be compromised on salmon stocks managed for abundance.

Proposal #51. Support. Reallocating salmon stocks in the Copper River is the prerogative of the board. More salmon for inriver folks to harvest during these historically low salmon returns on the Yukon is consistent with Article 8, Section 4 of the Alaska State Constitution. It is the preference among a bunch of beneficial users in the Interior and South Central to harvest some salmon.

Proposal #63. Oppose. Folks who choose to not live on the wildlife habitat and river drainages where they go to harvest their fish in state waters still want to get their winters supply of Copper River salmon home in early summer. The BOF allows these folks an opportunity to harvest salmon consistent with Art. 8, Sec. 3 Common use of the AK Const. There is no justification for reducing their traditional time of harvesting salmon in Personal Use fishery on the Copper River.

Proposal #64 and #65. Oppose.

Proposal #78. Support. AS 16.05.251(a)(9) says the BOF can regulate salmon egg releases. There is ample evidence that “overgrazing by hatchery released salmon” is more than likely one of the causes for declines in salmon weight in Alaska waters. The proposer asks for a 5 year evaluation. Let’s see if it makes a difference in returning salmon weights in PWS runs.



Alaska Whitefish Trawlers Association

PO Box 991 | Kodiak, Alaska 99615
Ph: (907) 654-9888 | <http://www.alaskawhitefishtrawlers.org>

November 26, 2024

Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Anchorage, Alaska 99811-5526

Submitted via online portal

Re: Oppose Proposals 14, 15, 16, and 17 – Prince William Sound Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members:

Alaska Whitefish Trawlers Association (AWTA) opposes Proposals 14, 15, 16, and 17.

Alaska Whitefish Trawlers Association is a Kodiak-based trade association of independent family-owned fishing businesses operating in the Gulf of Alaska, Bering Sea, and West Coast groundfish fisheries. Our owners, captains and crew live in Kodiak and have a vested interest in the continuing vitality of the community. Trawl is the backbone of commercial fisheries in Kodiak, delivering approximately 60% of all Kodiak landings each year and allowing processing plants to remain open nearly year-round. Kodiak is arguably the most diverse fishing port in Alaska and consistently ranks within the top 10 ports in the nation for volume and value of fish landed.

Kodiak is not immune to the significant challenges currently facing the seafood industry, including high operating costs, trade barriers, and competition from land-based proteins. The Alaska Legislature formed the Alaska Seafood Task Force earlier this year to explore how the State can support the seafood industry, and a common theme from testifiers has been stability. Our coastal communities and fishing businesses need stability right now as they try to weather the storm and make it through these challenging times. AWTA members rely on the PWS pollock fishery and we ask the Board to support our operations and not take actions that needlessly hurt our fishery and community.

AWTA members rely on the Prince William Sound (PWS) pollock fishery as the first fishery of the year, which occurs as pollock aggregate in PWS in January. The PWS pollock fishery originally began in 1995 with all pollock delivered to Cordova; with changes in processor operations and ownership over time deliveries are now made primarily to Kodiak plants.

Proposal 14 seeks to prohibit trawling in PWS unless trawl gear does not contact the bottom and there is zero chinook bycatch during the fishery. This proposal would shut down our fishery because it is not possible to completely eliminate bycatch, and in fact every fishery operating in Alaska has bycatch. The PWS pollock fishery is actively managed with strict bycatch limits, and ADFG closely monitors trawl activity so that if a limit is exceeded the fishery can be swiftly shut down. The fishery exceeded its chinook cap twice in the last 15 years, by 189 pounds in 2020 and by 297 pounds in 2021, which resulted in section closures in each of those years. PWS pollock trawl operators are not fishing their pelagic nets on the bottom. First, the trawl gear costs upwards of \$200,000 and fishermen do not have an incentive to risk damaging or losing their gear in PWS.

AWTA Comments on PWS Pollock Fishery Proposals

November 26, 2024

Page 2 of 2

Secondly, the seafloor in PWS is rocky and would rip up a pelagic net if the net contacted the bottom. Further, most of PWS has not been surveyed since the 1964 earthquake, and current charts include a statement that the depths on the charts may be inaccurate due to shifts in the seafloor as a result of the earthquake. Operators are not going to chance ripping up their net by allowing the net to get too close to the bottom. The Department opposes this proposal and we agree with staff comments.

Proposal 15 seeks to change from an overall bycatch limit calculated as a percentage of the pollock GHJ to a static bycatch limit expressed in pounds. The Department opposes this proposal. AWTA agrees with staff comments and does not believe Proposal 15 would improve management of the fishery. Under current management the Department only allows 6-8 vessels to fish in PWS at once; vessels are required to notify the Department when they leave Kodiak and then again before they enter PWS. Vessels must report catch on a tow-by-tow basis, and chinook and rockfish are each managed under a separate limit. When a limit is reached then the fishery is shut down. Given rapidly changing ocean conditions it does not make sense to change to a static cap and limit the Department's ability to dynamically manage the fishery by EO.

Proposal 16 seeks to close the PWS pollock fishery. AWTA strongly opposes this proposal because closing the fishery will harm our Kodiak fishing businesses, shore-based processors, and the community of Kodiak. The Department opposes this proposal and AWTA agrees with staff comments. Closing the fishery would result in a \$1,000,000 loss of annual revenue from directed pollock landings. Bycatch would be reduced – by about 12,000 pounds for rockfish and 2,400 pounds for king salmon - but note that the Department states there is no conservation concern in this fishery. If the pollock fishery is closed there are concerns that predation by pollock on juvenile pink salmon would increase (because there would be more pollock present in PWS). This unintended consequence would negatively impact salmon fisheries and hatchery operations in PWS.

Proposal 17 seeks to require 100% Electronic Monitoring (EM) and 50% physical onboard observers on trawl pollock vessels. In regards to EM the BOF and Department currently lack authority to require EM on any fishing boat. There is authority to require onboard observers but it would be very costly. The Department opposes this proposal and states, “[establishing an onboard observer program] would result in considerable costs to the department and industry to implement.” The Department already closely manages the PWS pollock fishery and does not have conservation concerns. Our industry is already grappling with significantly increased operating costs and the benefits of this proposal do not justify the cost it will add to our businesses.

Thank you,



Patrick O'Donnell, Board President
Alaska Whitefish Trawlers Association

November 20, 2024

Board of Fisheries
Prince William Sound Finfish Meeting
December 10 – 16, 2024
Cordova, Alaska

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

Proposal 156, 5 AAC 33.364 Southeastern Alaska Area Enhanced Salmon Allocation Management Plan

Dear Chair Carlson-Van Dort and Board Members:

We would like to express our opposition to Proposal 78 and Proposal 156. These are nearly identical proposals to Proposal 43 heard less than nine months ago at the Upper Cook Inlet (UCI) meeting in Anchorage, a proposal that failed on a 1:6 vote. The lack of new information or new evidence to support proposal 43's premise that hatchery produced pink and chum salmon cause deleterious effects on Bering Sea salmon stocks (i.e., Yukon and Kuskokwim), further underscores the wisdom of maintaining the Board's previous decision. The exhaustive record from the most recent UCI and Lower Cook Inlet (LCI) meetings remains relevant and should continue to guide your deliberations for your upcoming meetings. Research published after the UCI meeting by Sovmov et.al. (2024)¹ provides additional evidence that temperature and climate show a positive correlation among pink, sockeye, and chum biomass, rising and falling together. Research by Yasumiishi et.al. (2024)² in an empirical marine study finds a positive correlation with juvenile sockeye and juvenile pink salmon during their first year in the Eastern Bering Sea.

¹ Sovmov, A., et.al. 2024 Comparison of Juvenile Pacific Salmon abundance, distribution, and body condition between Western and Eastern Bering Sea using spatiotemporal models. Fisheries Research Journal

² Yasumiishi, E. 2024 Biological and environmental covariates of juvenile sockeye salmon distribution and abundance in the southeastern Bering Sea, 2002–2018. Ecology and Evolution

These above papers will be summarized and added to an updated Critique of Synthesis Papers, originally submitted as PC 4 at the UCI meeting.³

When considering these proposals, it is important to acknowledge the limitations of the Board's authority as framed by **AS 16.10.440(b)**⁴ which the proposer points out in his opening statements⁵. Hatchery egg permitting authority resides with the commissioner of Fish and Game, a fact emphasized by numerous stakeholders over the past two decades, including the Ashburn & Mason opinion⁶, fishermen groups, PNP operators and at least one legislative attorney present at the original drafting of this administrative code. It appears the author of proposals 78 & 156 struggles to find a relevant regulation to cite for his proposal, settling on **5 AAC 24.370** for Prince William Sound (PWS)⁷, and **5 AAC 33.364** for Southeast⁸, regulations that do not include or even pertain to Valdez Fishery Development Association (VFDA) referenced in proposal 78. Furthermore, these regulations lack any reference to permitted salmon egg capacity. The cited regulations delineate the allocation of enhanced salmon among fishing gear types in Special Harvest (SHA) and Terminal Harvest Areas (THA). These enhanced salmon regulations codify 'fair' harvest proportionality that was vetted by Board of Fish directed committee work and endorsed by PNP boards of directors prior to Board of Fish adoption in the 1990s.

³ PC 4 Upper Cook Inlet meeting, Anchorage Feb 23 – March 5, 2024. Critique of Synthesis Papers, pg. 13 – pg. 36.

⁴ Alaska Statute 16.10.440(b) The board of fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400.

⁵ Proposals 78 & 156 paragraph five

⁶ Ashburn & Mason letter to the Board June 9, 2018

⁷ Private Nonprofit Salmon Hatcheries, Chapter 24 PWS Management and Salmon Allocation Plan Article 3 Salmon Fishery

⁸ Private Nonprofit Salmon Hatcheries, Chapter 33 SE Alaska area, Article 3 Salmon Fishery

The Board of Fish was fully immersed in regulation **5 AAC 24.370** encompassing Prince William Sound Aquaculture Corporation (PWSAC) enhanced salmon, a multiple years-long process, debated and agreed upon by gear groups, the PWSAC board of directors and then adopted by the Board of Fish as the Prince William Sound Management and Salmon Enhancement Allocation Plan, which begins:

“5 AAC 24.370 (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.”

5 AAC 33.364 for Southeast went through a similar process with the Board of Fish in the early 1990s; the Board adopted **Finding #94-02-FB** consisting of eight pages in the Private Nonprofit Salmon Hatcheries regulation book. The first of the fourteen findings of the task force was “1 The primary goal of the Southeast Alaska salmon enhancement program is to provide additional fishing opportunities and revenue to traditional common property fisheries.” The remaining thirteen findings and rationales do not refer to permitted eggs, although when attempting to rectify allocation imbalances one of the tools in Finding 13. (2) is to add “new enhanced salmon production”.

To reiterate, the allocation plans for PWSAC and Southeast are *regulations* adopted by the Board of Fish, the permitting of eggs resides within the *administrative code* under the commissioner of Fish and Game.

Proposals 78 & 156 incorrectly state there are no other venues to address hatchery issues. However, it is important to recognize that there are numerous platforms open to public involvement beyond the Board's proceedings, which by anyone's standard has been voluminous. However, these additional public forums include Regional Planning Team meetings in every region of Alaska, updates to the Salmon Management Plan which entail several years of public meetings, the Alaska Hatchery-Wild Interaction research meetings and website⁹, all PNP board meetings, and the Board of Fish's own Hatchery Committee¹⁰, all of which is to emphasize the commitment to a broader public dialogue on this topic. It must be pointed out that other than the Board of Fish, the author of the proposal has not advantaged himself of these opportunities.

Proposals 78 & 156 in paragraph 6 of each *provide* the answer to the board for which he *asks*:

“For several years, different groups have been submitting proposals for hatchery egg take reduction. All those proposals **have been refused on the basis of lack of conclusive evidence** (*emphasis added*) that there is a correlative relationship to detrimental impacts of hatchery production in wild stocks through competition for forage food and straying.”

The evidence which the author states in his words is “*correlative*”, and not cause and effect or empirical. At the March 2024 UCI meeting extensive scientific evidence published

⁹ https://www.adfg.alaska.gov/index.cfm?adfg=fishingHatcheriesResearch.current_research

¹⁰ <https://www.adfg.alaska.gov/index.cfm?adfg=fisheriesboard.meetinginfo&date=10-14-2023&meeting=anchorage>

by NOAA scientists, International Year of the Salmon Japanese, Russian, Korean, and North American scientists, ADF&G's own Salmon Ocean Ecology Program scientists, and independent researchers was presented. These primarily empirical studies pointed to why Yukon River chum experienced declining survival in ocean years 2016 to 2019. These extreme warm ocean years in the Bering Sea and North Pacific Ocean affected marine survival as demonstrated by poor Yukon River adult returns in 2020 and 2021. As the board well knows, this is only a tiny sample of what was presented at the UCI meeting in March 2024.

The claims made by proposals 78 & 156 regarding the integrity and rigor of the scientific literature presented to the Board are misguided. Peer-reviewed research has been shared, presenting a dual view—supporting and refuting the proposer's position. However, what is critical is that our attention must remain on empirical findings that establish clear links between cause and effect rather than speculative correlations which can and have been misleading.

To provide some context on this issue, at the UCI meeting the proposer of 78 and 156 testified fifteen minutes to his proposal 43,¹¹ exclaiming his pique for the loss of his chum salmon roe markets on the Yukon River thirty years ago. In his final minutes he got around to the recent speculative research papers. These synthesis papers were addressed in two

¹¹UCI Board of Fish meeting testimony February 26, 2024, 11:01 a.m. to 11:25 a.m.
<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/swf/2023-2024/uci-2/index.html?mediaBasePath=/Meeting%2002-26-24%20%282%29%20%28Feb-26-24%204-25-18%20PM%29>

documents: PC 4¹² and PC 174¹³ at the UCI meeting and will be re-submitted for the Cordova and Ketchikan meetings.

What a 25% reduction in chum and pink salmon permitted egg production would mean

The financial foundation of the PNP hatchery system is built on pink and chum production, primarily chum salmon in Southeast hatcheries and pinks and chum in the South Central and Kodiak regions. Pinks and chum have short-term hatchery freshwater residence and are relatively easy to raise compared to coho, chinook, and sockeye, and spend most of their lifecycle in the ocean. Like most salmon, ninety-six percent of the fry and rearing fish are consumed by ocean predators, the majority of the mortality within the first forty-five days of ocean life¹⁴. The one to four percent that survive to the adult stage provide for important local fisheries, cost recovery harvest revenue, and broodstock to perpetuate the program.

Income for the PNP programs flow from two major sources, a 2% or 3% enhancement tax (SET tax) that fishermen pay on wild and enhanced salmon, and the sale of salmon harvested in the terminal areas adjacent to the hatchery facility. Approximately twenty percent of the revenue derives from the SET tax, while most of the revenue (~75%) is from the sale of pinks and chum. Smaller revenue streams from the other three salmon species,

¹² Critique of Synthesis Papers

<https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/uci/pc1-50.pdf>

¹³High Ocean Biomass <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/uci/pc151-200.pdf>

¹⁴ Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia

grants, and Pacific Salmon Treaty projects make up the remainder. Each organization is unique, so these figures and proportions are approximations.

Enhancement programs that benefit sport charter, personal use, subsistence, and local communities usually consist of coho, chinook, or sockeye, and are paid for by revenue derived from chum and pink salmon cost recovery. Capital improvements and loan repayments to the State of Alaska are also primarily from the sale of pink and chum salmon to processors.

Cutting production of pink and chum salmon would significantly reduce these revenue streams making it difficult, if not impossible, to meet State of Alaska Fisheries Enhancement Revolving Loan Program repayment obligations, particularly in years when pink and chum prices bottom out. In 2023 and 2024, prices were so low that some hatchery programs failed to make corporate cost recovery goals. Reduction of revenue would also necessitate reducing chinook, sockeye and coho programs due to their significantly lower return on investment, due to their high dependence of funding from pink and chum cost recovery revenues. In addition to diminishing the ability to repay State of Alaska loans, PNPs in Southeast may have difficulty meeting their production obligations to fishermen; programs where capital improvements were covered by Pacific Salmon Treaty monies, and finally, to be realistic some PNPs will likely decline into bankruptcy.

Economically, a 25% reduction would be devastating to communities from Ketchikan to Cordova to Kodiak. Coastal communities are dependent on local fisheries and fish

processing plants for fisheries related tax revenues, jobs, and local support businesses.

The speculative benefits that the proposer hopes for is a gamble for an outcome that empirical science suggests will not bear out. To that point, PNP operators submitted a paper on High Ocean Biomass¹⁵ PC 174 at the UCI meeting that states that all salmon are estimated to make up 4-7% of the nekton biomass (all swimming animals and fishes). All pink salmon which the vast majority if wild would thus compose 1-2% of this biomass, and hatchery pink salmon < 0.5%., a proportion that has not been shown to affect local or broad trophic conditions in the Bering Sea or North Pacific Ocean.

No new hatchery permitted pink and chum egg production, 2019

The perception that Alaska hatchery chum and pink production continues to increase is simply not true. The Fairbanks AC raised this issue at the UCI meeting and therefore needs explanation and clarification. The PNP hatchery operators met with the commissioner of the Department of Fish and Game in 2019 to discuss limiting the number of pink and chum salmon eggs to existing permitted capacities approved by the department. The operators agreed at the meeting in 2019 that no new increases to hatchery operating permits for pink and/or chum salmon eggs would be applied for or granted by the department. The commissioner was clear at that time that no additional requests for increased pink and/or chum permitted capacity would be approved until further research on the effects of hatchery production were concluded. Since 2019, actual chum eggs taken at hatcheries in Southeast have remained at, or below permitted capacity approved by the commissioner. At times broodstock shortages can lead to

¹⁵ Wertheimer et.al. 2018 High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate, PC174

missing the egg goal. Between 2019 and 2024 brood stock shortages prevented operators from achieving their permitted capacity, explaining the appearance of an increase after the agreement with the commissioner. Most importantly, there has been no new pink or chum egg permitted capacity requested or approved for hatchery production since the agreement in 2019.¹⁶ PNP hatcheries may not exceed their permitted capacity (see graph below).

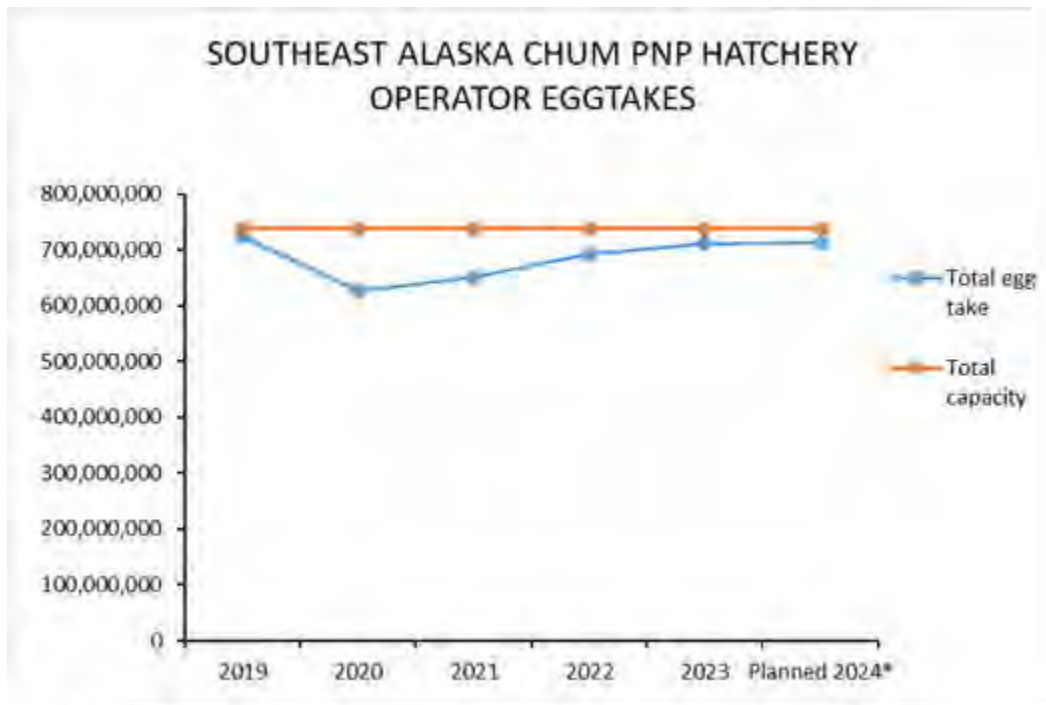


Figure 1. Southeast Alaska all hatchery facilities aggregated permitted chum egg capacity from 2019 to 2024, except Annette Island Indian Reservation (Tamgas Creek Hatchery). Note stability in permitted capacity (dotted orange line at top) since 2019 and egg take numbers (dotted blue line) which are consistently below the maximum permit number.

¹⁶ Alaska salmon fisheries enhancement annual report, 2023.
<https://www.adfg.alaska.gov/FedAidPDFs/RIR.5J.2024.05.pdf>

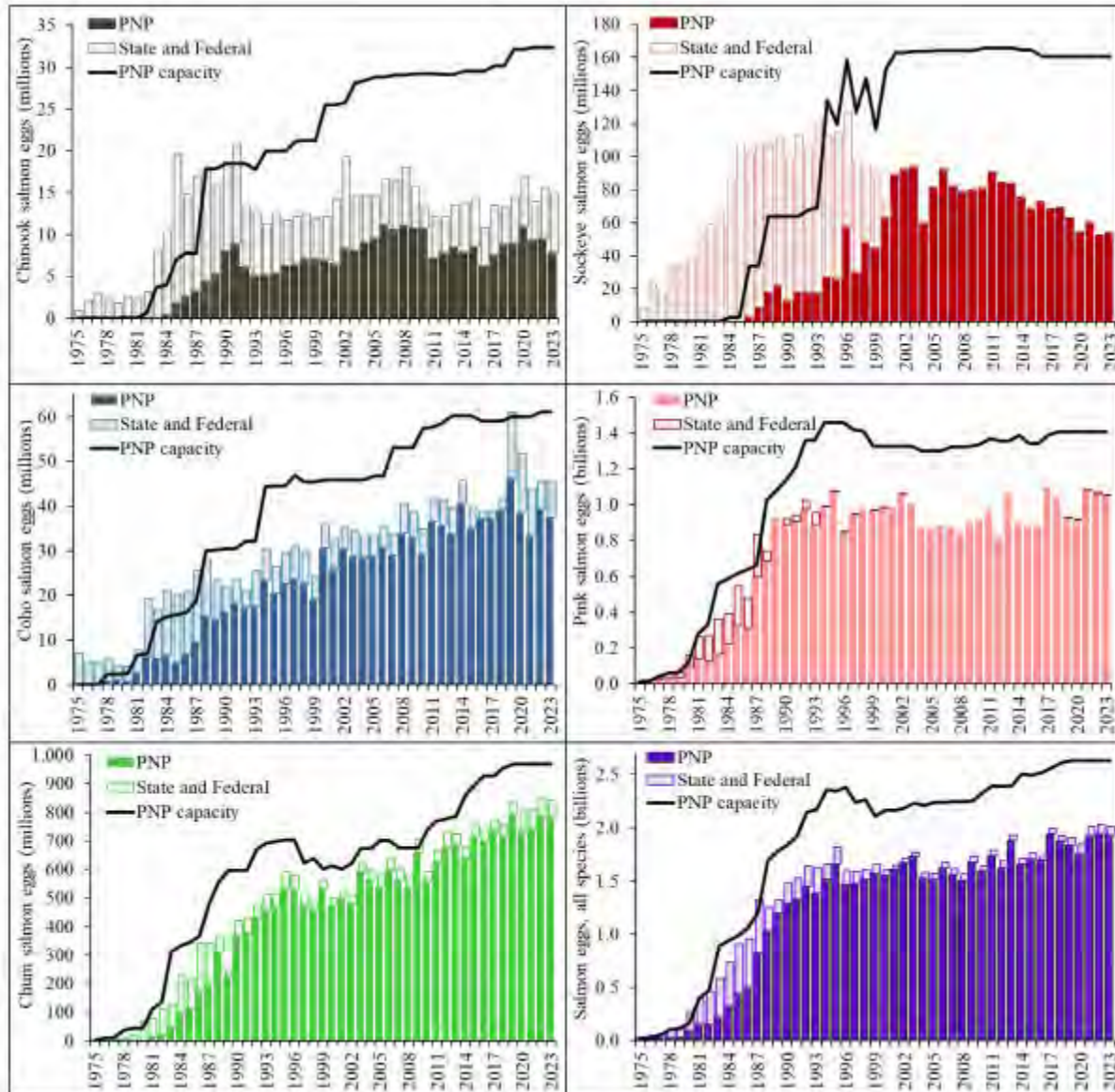


Figure 2. Graphic from Alaska salmon fisheries enhancement annual report, 2023 (pg. 24 figure 8). Bars denote hatchery salmon eggs collected by PNP, state, and federal hatcheries, and PNP hatchery permitted capacity (black line) by species and total, 1975–2023. Difference between bars and capacities is due to several factors: egg survival is less than 100% and IHNV incidence requires destroying sockeye eggs (primary causes), and broodstock availability,

Thank you for your consideration of our concerns regarding proposals 78 and 156. We believe it is essential to uphold the scientific rigor and integrity that underpin responsible management of our salmon resources. We look forward to speaking further with the Board during the upcoming meetings.

Sincerely

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Northern Southeast Regional Aquaculture Association
Scott Wagner, General Manager

Prince William Sound Aquaculture Co.
Geoff Clark, General Manager/CEO

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

Douglas Island Pink & Chum
Katie Harms, Executive Director

November 20, 2024

Board of Fisheries
 Prince William Sound Finfish Meeting
 December 10 – 16, 2024 Cordova, Alaska
 January 28 – February 9, 2025 Ketchikan, Alaska

Update to PNP Critique of Synthesis Journal Papers regarding Proposals 78 & 156

Dear Chair Carlson-Van Dort and Board Members:

Alaska's PNP operators submitted PC 4 pertaining to proposal 43 at the UCI in February 2024 (attached to this update). Proposals 78 and 156 are nearly identical to Proposal 43, and therefore PC 4 remains timely and relevant. We submit additional research published since the conclusion of the UCI meeting, these empirical studies bolster and add to our position. The three papers portray a complex mosaic of ecological factors, some of which show positive relationships between pink/chum salmon and sockeye in the Eastern Bering Sea. What follows is a summary of three recent journal papers.

Yasumiishi, E., et.al. *Biological and environmental covariates of juvenile sockeye salmon distribution and abundance in the southeastern Bering Sea, 2002–2018*¹

This study was funded by the North Pacific Research Board (NPRB) and NOAA Arctic-Yukon-Kuskokwim Sustainable Salmon grants and focused on the eastern Bering Sea to understand ecological influences on juvenile sockeye. The study had four hypotheses: 1. Nonlinear effect of temperature on juvenile sockeye, 2. Positive effects of *Calanus* copepods on juvenile sockeye, 3. Positive effects of age-0 pollock on

¹ Yasumiishi E., Cunningham C., Farley E., Eisner L., Strasburger W., Dimond J., & Irvin P. Ecology and Evolution, March 2024.

juvenile sockeye, and 4. Negative effects of juvenile pink salmon on juvenile sockeye.

Not surprisingly, sea temperature was found to influence juvenile sockeye biomass (hypothesis 1), but *Calanus* copepod abundance did not explain variation in annual biomass and distribution of juvenile sockeye (hypothesis 2).

Most important to this discussion is the study's Hypothesis 4 finding quoted here from the paper:

“Contrary to our hypothesis, a positive rather than negative association occurred between the annual biomass of juvenile sockeye salmon and juvenile pink salmon.”

In other words, Yasumiishi et.al. found when environmental conditions favored pink salmon they favored sockeye juveniles, rather than pink salmon abundance being detrimental to sockeye. During the period studied from 2002 to 2018 high abundance of juvenile pink salmon in the eastern Bering Sea did not negatively affect juvenile sockeye in their first ocean year. Furthermore, the paper emphasizes the lack of competition:

“Similarly, a positive effect of juvenile pink salmon on the spatio- temporally varying densities of juvenile sockeye salmon suggests ***no significant competition for food*** (emphasis added) or niche partitioning between these species. Intense interspecific competition can restrict or displace a niche and lead to habitat partitioning (Cox, 1968).”

As the oceans warm, empirical studies of this nature are critical to our understanding of rearing salmon distribution and abundance. It is well known that juvenile salmon are

moving further north to feed as the winter ice diminishes, melts earlier, and adult salmon are pushing north due to newly available spawning habitat.

Somov A. et.al., *Comparison of Juvenile Pacific Salmon abundance, distribution, and body condition between Western and Eastern Bering Sea using spatiotemporal modes*²

Unfortunately, climate change affects regions differently; in the short term at least some are winners and some salmon stocks do less well as presented in the Somov et.al., paper. The eastern Bering Sea (Alaska) has shown reduced productivity while the western Bering Sea (Russia) has experienced increased productivity especially with pinks and chum salmon at the juvenile and adult life stages. This empirical study used marine surveys across the Bering Sea. Research focused on pink, chum, and sockeye salmon using marine survey data from 2002 to 2022. There were clear distinctions between western Bering Sea (WBS) and eastern Bering Sea (EBS) such that the WBS juvenile salmon were larger in size with higher condition factors (health) compared to EBS in even years. The EBS experienced greater temperature variation resulting in declines in abundance and body condition in warm years. These findings line up with Oke K. et.al.³, and Howard K. et.al.⁴ which demonstrated that the severe warm years 2016 to 2019 resulted in emaciated juveniles and sub adults when sampled in the Bering and North Pacific during those years. At the same time on the other side of the

² Somov A., Farley E., Yasumiishi E., and McPhee M. Comparison of Juvenile Pacific Salmon abundance, distribution, and body condition between Western and Eastern Bering Sea using spatiotemporal modes. Fisheries Research 2024

³ Oke K., et.al. 2020 Recent declines in salmon body size impact ecosystems and fisheries

⁴ Howard K., Alaska Department of Fish and Game, October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research*. Presentation to Board of Fish

Bearing, Russia has experienced inordinate pink salmon production and marine survival.⁵

Somov et.al., findings show concurrence with Yasumiishi et.al. Somov et.al. in their conclusion section (second paragraph) states:

“The first marine year for salmon (pink, chum, and sockeye) in the WBS and EBS differ in several ways. First, pink salmon dominate the WBS, accounting on average for 93% of abundance, while in the EBS, sockeye salmon (48% of the juveniles) is a dominant species. The relative and total juvenile salmon abundance in the WBS and EBS are approximately equal, with the WBS abundance twice as high as in the EBS in even-numbered years and five times lower in odd-numbered years. In the WBS, all species considered were characterized by a two-year cycle with higher abundance in even-numbered years due to the intensifying influence of (Russian) pink salmon. In the EBS, where pink salmon is not the dominant species, juvenile chum and sockeye salmon did not show such biennial fluctuations.”

Fedder M., et.al. *Body size and early marine conditions drive changes in Chinook salmon productivity across northern latitude ecosystems*⁶

⁵ North Pacific Anadromous Fish Commission report

⁶ Fedder, M., Shaftel R., Schoen E., Cunningham C., Connors B., Staton B., Finster A., Liller Z., Biela V., Howard K. 2024. Global Change Biology

Yukon River chinook like many chinook stocks in Alaska have declined in productivity, with much of the research directed toward marine studies and ocean survival. Feddern et.al. attempt to investigate both freshwater and ocean life to assign which drivers may have the greater importance. Decreased productivity has been linked with increasing ocean and freshwater temperatures, streamflow, body size, and competition for prey. Predation is not considered in this work.

Feddern et.al. looked at 26 chinook populations in the Yukon-Kuskokwim region, estimating productivity effects of marine and freshwater environmental indicators, body size, and competition. In this paper productivity is defined by return per spawner. Quoting from the abstract Feddern et.al. note:

“Across most populations, productivity declined with smaller spawner body size and sea surface temperatures that were colder in the winter and warmer in the summer during the first year at sea. Decreased productivity was also associated with above average fall maximum daily streamflow, increased sea ice cover prior to juvenile outmigration, and abundance of marine competitors, but the strength of these effects varied among populations” and they conclude, “These results demonstrate for the first time that well- documented declines in body size of YK Chinook salmon were associated with declining population productivity, while taking climate into account.”

Delving into the Yukon-Kuskokwim freshwater component of chinook productivity decline the authors write:

“Evidence of heat stress during freshwater spawning migrations and reduced productivity in years of warm freshwater migrations have emerged as important stressors in recent years for high latitude Pacific salmon populations. River temperatures that exceed 18°C induce heat stress in spawning Yukon River Chinook salmon that is more prevalent in warm years. Howard and von Biela (2023)⁷ estimated *that 45% of the variability in production of juvenile Chinook salmon per adult spawner can be attributed to conditions that adults* (emphasis added) experienced during the spawning migration.”

Fedder's, conclusion that 45% of chinook productivity variation is tethered to a few months of the spawning migration is profound. It is well documented that interior Alaska is warming at two to three times the rate of the Lower 48⁸ and therefore it does not seem unexpected that freshwater habitats in Alaska are breaching the lethal threshold for chinook salmon. Even temperatures below but near the lethal 18°C have deleterious effects.

⁷ Howard, K. G., & von Biela, V. (2023). Adult spawners: A critical period for subarctic Chinook salmon in a changing climate. *Global Change Biology*, 29(7), 1759–1773. <https://doi.org/10.1111/gcb.16610>

⁸ Alaska Salmon Research Task Force Report NOAA 2024

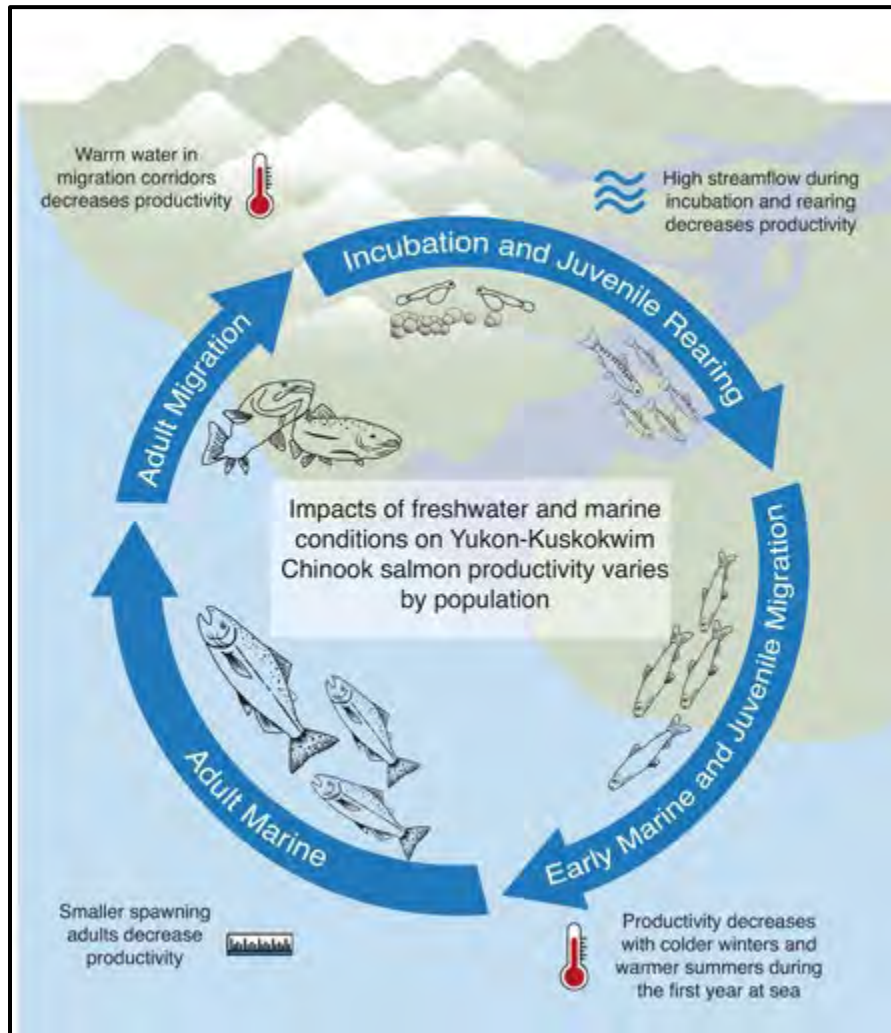


Figure 7. from **Feddern et.al.** 2024 journal article: *Body size and early marine conditions drive changes in Chinook salmon productivity across northern latitude ecosystems*

The three journal articles presented here are to demonstrate good faith response to proposals 78 and 156 which lack a factual basis and make unsupported statements. The PNP operators have provided several documents with numerous empirical studies, including the above addendum, High Ocean Biomass of Salmon and Trends in Alaska

Salmon in a Changing Climate, and PC 4 Critique of Synthesis Papers from the UCI meeting, among other documents.

This addendum is a small piece of the Critiques of Synthesis (attached). However, all the documents referenced herein are to be considered in aggregate. Our intention is to highlight the newest information upfront, rather than update the paper with this addendum buried within.

Alaska's hatchery program was developed using empirical and applied science. ADF&G and the PNPs continue to rely on the fundamental principles of science to improve hatchery programs and to understand any significant impacts. We look forward to working with you at the upcoming Cordova and Ketchikan meetings.

Sincerely,

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Northern Southeast Regional Aquaculture Association
Scott Wagner, General Manager

Prince William Sound Aquaculture Corporation
Geoff Clark, General Manager/CEO

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

Douglas Island Pink & Chum
Katie Harms, Executive Director

Addendum PC 4 Upper Cook Inlet Meeting

To: Alaska Board of Fisheries

February 8, 2024

UCI Meeting February 23 – March 6, 2024

From: PNP Alaska Hatchery Group

Re: Proposal 43 5 AAC 40.820 Basic Management Plans & Response to Synthesis Research

Dear Chair Wood and Board Members:

At the Alaska Hatchery committee meeting October 14, 2023, RC 002 and RC 003 Ruggerone and McMillan synthesis papers were submitted to the Board, but there was little chance for discussion and context. We appreciate the opportunity to comment here. These are lengthy synthesis papers and therefore they deserve a proper substantive response. Nonetheless, we intend to maintain concision and clarity. In this paper we will present informative studies/research on the topics of pink salmon abundance, salmon enhancement, and mechanisms for salmon declines regionally while recognizing there are also significant increases in salmon productivity in other regions of the North Pacific Ocean.

I. Introduction

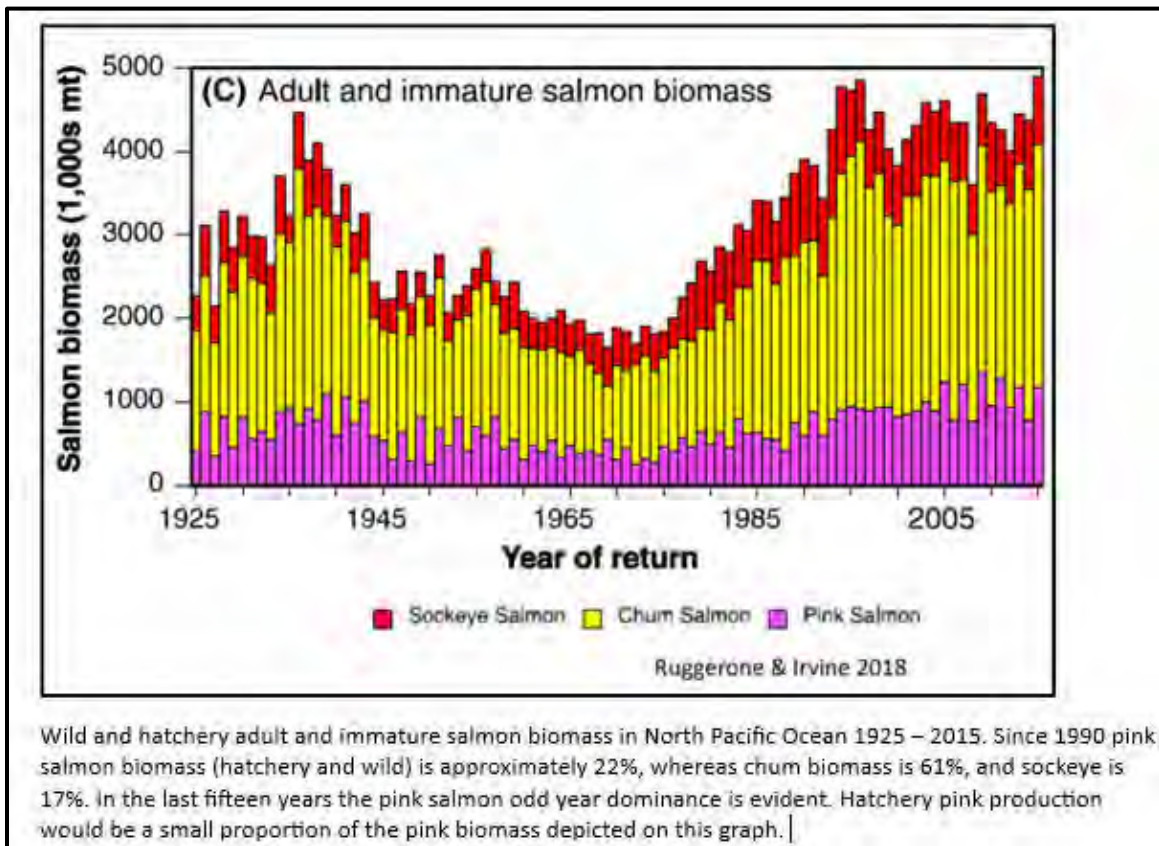
The two research papers for consideration are *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems*, Ruggerone et.al., and *Global Synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*, McMillan et.al. These papers are dense with historical data and hypothesize negative correlations that suggest pink salmon impacts on other species, and specifically hatchery produced salmon impacts on wild salmonids, mammals, avians, and other life forms. However, they do not demonstrate a mechanistic linkage. We will show contrary research that reveals mechanistic linkages for increases in Alaska salmon productivity (both wild and enhanced) ushered in by the post 1977 regime shift (Pacific Decadal Oscillation or PDO), as well as other research that demonstrates small effects of ocean rearing juvenile salmon to regional zooplankton densities.

The debate about ocean carrying capacity has been ongoing in Alaska since the inception of the Ocean Ranching program in the mid-1970s. We do not contend that hatcheries have no effects. There are potentially negative ones, relative reproductive success (RRS) for example. However, there are benefits such as Pacific Salmon Treaty offsets and more king salmon for sport fisheries as well as reducing harvest impacts on natural stocks by all user groups. The best counterargument to the Ruggerone and McMillan papers is the Wertheimer et.al. document presented to the board of fisheries in 2018.¹ We will separately resubmit and update: *High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate* with an on-time public comment. However, the most salient points that challenge the Ruggerone and McMillan papers will be presented in this document, including pertinent references to the Wertheimer et.al. paper. Prior to discussing research, we feel it is critical to establish baseline information and nomenclature to lend context to the discussion of Alaska hatchery production of pink and chum salmon which is often missing in scientific journals and opinion pieces.

Abundance vs Biomass

Definitions are necessary, to sort out the “apples versus the oranges” so we can keep the differences straight. There is understandable confusion with the terms abundance or numbers of salmon in the ocean versus biomass of salmon in the ocean (see graph below & graph page 3). This is particularly true when ascertaining which is the dominant driver or drivers of top-down effects. Pink salmon represent the greatest number or abundance of salmonids in the ocean in any given year, but not in biomass. Pink salmon have the smallest body size (two to four pounds) and migrate to the ocean in one year and return to their natal stream the following year, whereas chum (five to fourteen pounds) and sockeye (four to eight pounds) are far larger and spend two to four years in the ocean prior to returning to their natal stream.

¹ Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate.



Therefore, pink salmon peak in abundance in the spring as fry. However, as biomass chum and sockeye salmon surpass pink biomass in any single year. Mortality is a significant factor in the first thirty to forty-five days of ocean life for pink and chum when mortality on average is between 50% to 90%.²

Wild Pink vs Hatchery Pinks

The vast majority of pink salmon in the North Pacific and Bering Sea are from wild populations, estimated at approximately 25 billion fry annually throughout the Pacific Rim for all salmonids. An additional 5 billion fry are hatchery pink and chum fry from Russia, Japan, and Alaska. The hatchery proportion in terms of abundance of **all pinks is about 15%.**³ **The biomass of hatchery pinks** is an even smaller proportion, perhaps **less than 5%** (refer to the biomass graph above). These hatchery proportions, whether in abundance or biomass, significantly differ from

² Parker, R.R. 1968. Marine mortality schedules of pink salmon of the Bella Coola River, Central British Columbia.

³ Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate.

depictions elsewhere. Aggregate samples for abundance of juvenile pinks from the 2022 International Year of the Salmon research vessels align with the proportions above, 8.2% for Alaska hatchery pink salmon (although data is hampered by small sample size N=58). Chum salmon sample size was more robust (N=536), showing a hatchery portion of 15.3% for Pacific Rim countries while Alaska hatchery percentage is 5.4%, Japan 4.7%, Canada 0.6% and Russia 0.6%.⁴

Based on data from the Ruggerone paper here is the actual data that gets misquoted which we delineated in the High Ocean Biomass paper:

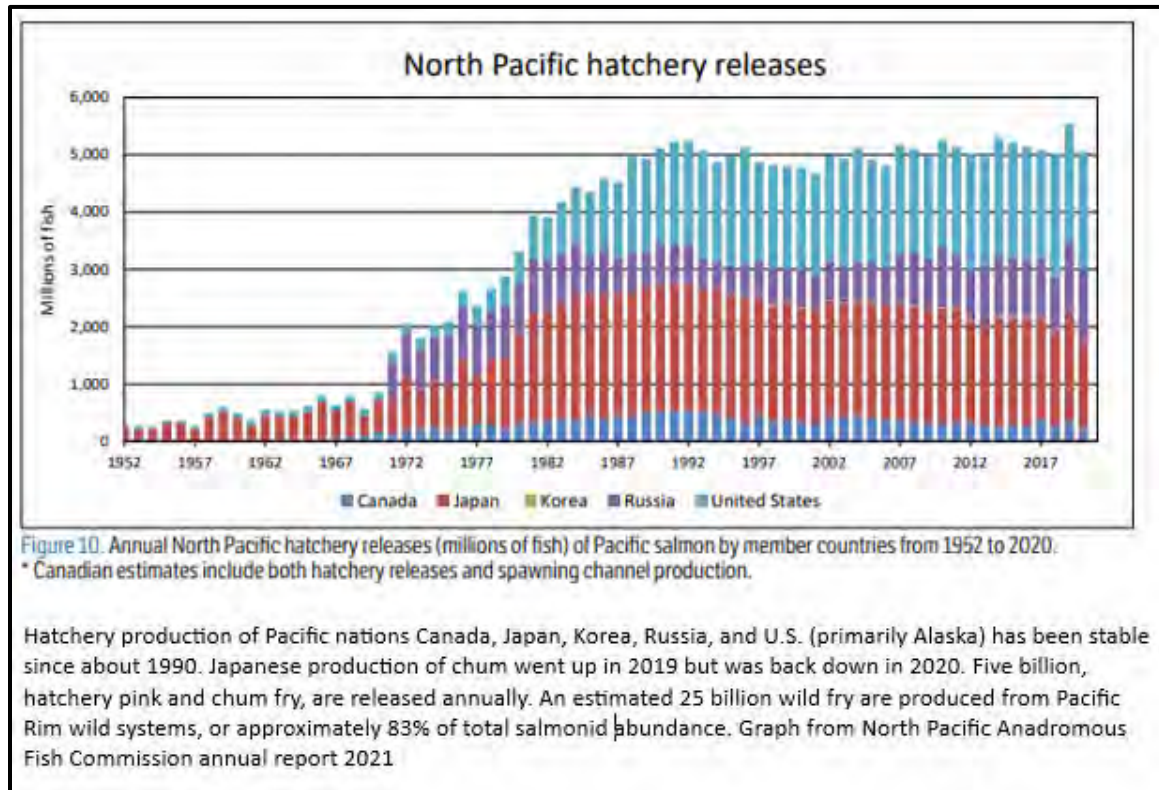
Approximately 39% of all North Pacific pink salmon, 22% of chum salmon, and 69% of sockeye salmon are produced in Alaska (combining wild and hatchery) production while most of the remaining quantities are produced by Japan and Russia. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye salmon during 1990–2015 were of hatchery origin (all countries). In particular, Alaska generated 68% and 95% of hatchery pink salmon and sockeye salmon, respectively, while Japan produced 75% of hatchery chum salmon. Large areas of Alaska (PWS and Southeast Alaska), Russia (Sakhalin and Kuril islands), Japan, and South Korea possess salmon abundance that is predominantly from hatchery production. During 1990–2015, hatchery salmon (Japan, Korea, Russia, and Alaska) constituted approximately 40% of the total biomass of adult and immature salmon in the ocean.

The misquote arises from the 40% value. It is correct to say that “of the total wild and hatchery adult and immature salmon biomass in the North Pacific, 40% is hatchery origin”. However, it is **incorrect** to state that 40% of pink, or pink and chum **are Alaska's hatchery-originated** salmon. Alaska’s hatchery component of that 40% is closer to 20%, with Japan and Russia contributing the remainder. Specifically, Japan produces 70% of the hatchery chum, while Alaska almost equals it with pink salmon hatchery production at 68% of North Pacific pink releases. These proportions seem large but to reiterate they are percentages of just the hatchery component which is about 15% of the total abundance of wild and hatchery salmonids.

⁴ Unpublished data from IYS. Source NOAA fisheries and ADF&G 2024.

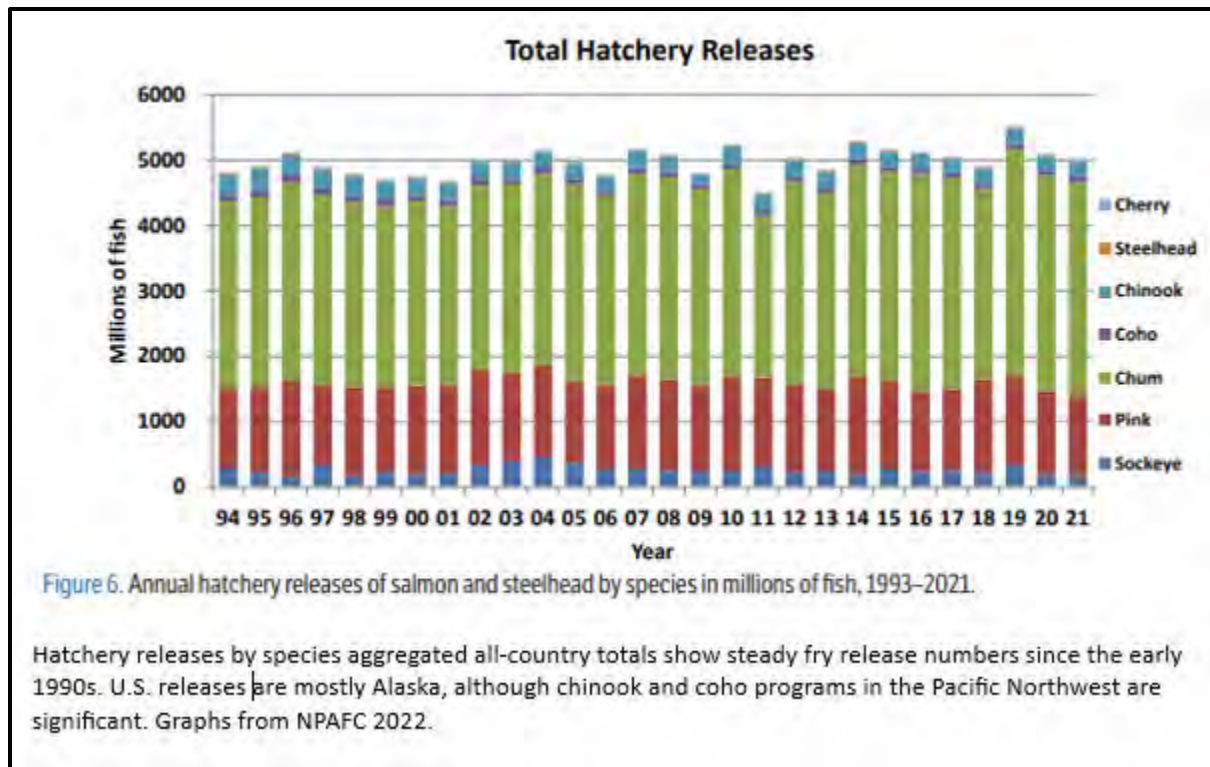
Hatchery Production by Country of Origin

Of the five billion hatchery salmon released into the Pacific each year, Russia (pink & chum) and Japan (chum) release about three billion salmon fry while Alaska releases approximately two billion fry (pink & chum). The annual assessment by the North Pacific Anadromous Fish Commission (NPAFC) shows that production has been nearly constant since 1990.



According to the North Pacific Anadromous Fish Commission, hatchery production varies by species, as illustrated in the figure below. Sockeye hatchery production is primarily concentrated in PWS and Canada, while the greatest production of chum salmon is in Japan (two billion) and Southeast Alaska. The highest level of pink salmon production is found in PWS and Russia.⁵

⁵ <https://www.npafc.org/>



II. Review/Discussion

Ruggerone et.al. *From Diatoms to Killer Whales; impacts of pink salmon on North Pacific ecosystems*, Ruggerone et.al.⁶

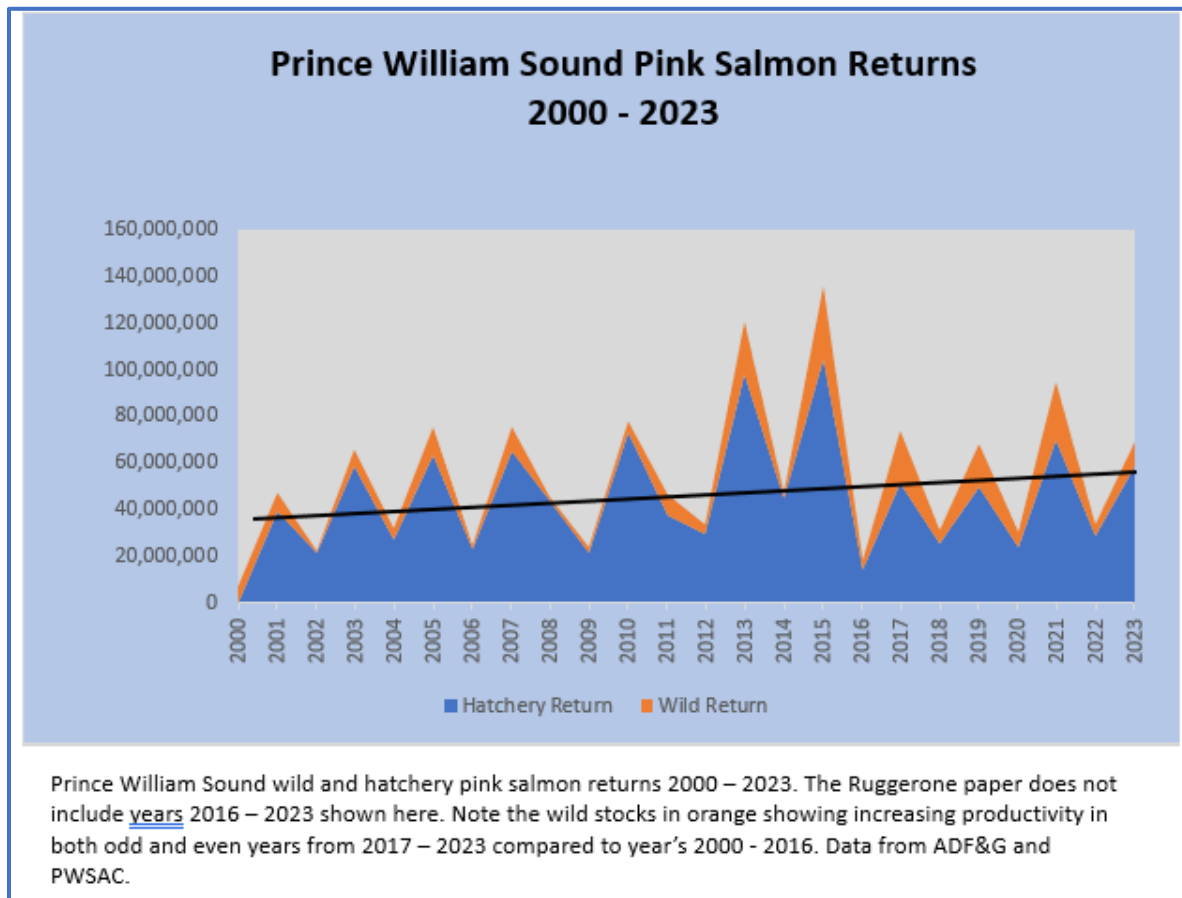
The scientific method relies on systematic, testable, repeatable methodology, and common data sets, especially when referring to historical data, for two reasons.⁷ First, the data set can be tested and repeated as in the original research. Second, the data set can be added to, replacing forecasted data (e.g., 2018 to 2023) with actual measured values. At the time of this writing, we were unable to obtain the data set Ruggerone cited to repeat the analysis -- a fundamental aspect of the scientific method. Furthermore, the biomass of immature and adult salmon cited in the abstract and picked up by casual observers "...hatchery production (~40% of the total adult and immature salmon biomass)" does not align with NPAFC data used in the paper cited previously. From 1990 to 2015, pink salmon's immature and mature biomass (hatchery and wild) was around 800,000 metric tons, or 22% of total biomass. The total abundance of wild

⁶ Ruggerone et.al. 2023. From diatoms to killer whales: impacts of pink salmon on North Pacific ecosystems

⁷ Lackey R., 2020. Darwin Was Right: A Scientist Needs a Heart of Stone

pink salmon fry in the North Pacific is proportionally 85%, with hatchery pink salmon making up the remaining 15%.⁸ Therefore the biomass of hatchery pinks is some fraction of the 22% pink salmon immature and mature biomass, certainly not 40%. Unfortunately, this fact seems to be misrepresented, or ignored when the original study is discussed in the press and public forums.

Regardless, major data sets, such as the one presented by Ruggerone, provide valuable insights. The paper does not argue a negative causal relationship between hatchery salmonids and wild salmonids, but rather synthesizes existing data sets to identify patterns and processes that may reveal how hatchery salmonids can potentially affect wild salmonids. To counter this notion, let's consider the actual data for Prince William Sound pink salmon. If we add Ruggerone's study to the five intervening years, wild pink salmon show an increasing productivity trend.



The authors acknowledge that the studies included in their synthesis did not necessarily imply causation, and therefore their work is speculative, as is true of similar past papers. Events may

⁸ High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

occur in tandem, but it does not necessarily mean that one directly causes the other. In scientific studies or data analysis, it is vital to differentiate between correlation (events happening together) and causation (one event directly influencing the other). Correlation may hint at a relationship between two things, but correlations can be misleading. In contrast, cause and effect is more akin to a sturdy bridge, supported by solid pillars of evidence and logical connections. This metaphorical bridge guides us with confidence from one understanding to another, unveiling the true nature of the world. Science, not advocacy, should be our guiding principle.

To explore an example from the Ruggerone paper, let's examine the predicted negative effects on herring stocks, where they specifically mention Sitka Sound herring. Contrary to their prediction, in the past five years, the large herring stocks in most of Alaska – Togiak, Kodiak, PWS, Craig, and Sitka Sound have increased significantly. For 2024, the Sitka Sound herring stock biomass is estimated by the ADF&G to be 406,228 tons of mature biomass, eclipsing any former biomass in Sitka Sound and exceeding that of Togiak. In 2023, the biomass in Sitka Sound was 292,669, a record until the 2024 estimate.⁹ The PWS herring, decimated by the 1989 oil spill, has been down for two decades but is now forecasted to have a harvestable surplus in 2024. Kodiak experienced the largest herring harvest of the past two decades in 2023.

The ocean is complex, and the forecasting model presented by Ruggerone, et.al. misses the mark. Similarly, killer whales and humpback whales have increased by multiples of two to three times in the past three decades.¹⁰ The model data may have been tailored for a particular outcome or simply overlooked the Alaskan killer whale population, rather they focused on Southern Resident killer whales, to suggest that pink salmon are the driver of their downfall. Yet, pink salmon production in the Salish Sea is minimal when compared to wild and hatchery pinks in Alaska where Killer Whales are thriving. There is a bit of anti-commercial fishing bias going on here. As an example, sport fishing groups – which funded some of the McMillan paper

⁹ <https://www.adfg.alaska.gov/static/applications/dcfnewsrelease/1552946314.pdf>

¹⁰ High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

- signed on to the Wild Fish Conservancy's lawsuit¹¹ against the State of Alaska aimed at halting commercial trolling, but not sport fishing on the very same Pacific Northwest king salmon stocks.

Contrary to large data set modelling, comprehensive research has been conducted in the Bering Sea and North Pacific Ocean by fishery science teams from the United States, Russia, Korea, Japan. This includes International Year of the Salmon (IYS) ocean studies spanning 2018-2022, that aimed to fill significant information gaps in our understanding of salmon migration, productivity, and the effects of marine heat waves. The NPAFC, an international body that compiles and reports on salmon status and research over the past 30 years, is another organization intimately engaged in this research. The latest IYS report for 2023 is currently in press but reports from 2022 and earlier are available. We will delve into a selection of these studies and others, presenting a more mechanistic perspective on 'From Diatoms to Killer Whales'.^{12,13} ADF&G scientists have played a crucial role in these endeavors, including the recently formed Salmon Ocean Ecology Program.¹⁴

Without a doubt, pink salmon are the most prolific salmon species, possessing remarkable reproductive abilities and extensive range capabilities in the Northern Hemisphere. Wild pink salmon have extended their range into the Arctic and around to Scotland and Sweden. Evolutionarily, pink salmon are the most successful salmon species yet the least intra-genetically distinct, defined by their short residence in freshwater (where prey are more limited) and their ability to spawn in a trickle of water to large rivers, or intertidal estuaries. Reports suggest their genetic plasticity benefits them in a warming ocean, with the odd-year component faring better than the even-year brood line. One might argue that pink salmon are the most resilient of the salmonids.

¹¹ <https://www.fisheries.noaa.gov/agency-statement/noaa-fisheries-recent-actions-wild-fish-conservancy-v-quan>

¹² <https://www.npafc.org/>

¹³ Technical Report 22 Report of the Final Workshop (November 1–2, 2023) Describing Observations Made During Winter Surveys of the International Year of the Salmon Expeditions to the Gulf of Alaska.

<https://www.npafc.org/technical-report/>

¹⁴ <https://www.adfg.alaska.gov/index.cfm?adfg=salmonoceanecology.main>

The Ruggerone paper sets out their basis for production and biomass, which is summarized in Wertheimer as follows: During 1990–2015, pink salmon dominated adult abundance (67% of total) and biomass (48%), followed by chum salmon (20% abundance, 35% biomass) and sockeye salmon (13% abundance, 17% biomass).¹⁵ Together the biomass of chum and sockeye salmon amounts to 52%. The total pink salmon biomass is 48%, of which approximately 85% of the 48% would be wild pink biomass. This equates to 41% wild pink biomass, **7% hatchery pink biomass** (all Pacific Rim countries), 35% chum biomass, and 17% sockeye biomass. The remainder of 4% biomass is coho and Chinook.

For additional context of salmonid biomass within total North Pacific nektonic biomass Shuntov et.al.¹⁶ and Wertheimer provide the following insights:

In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Since then, biomass of salmon has increased current levels of 4-5 million tons, representing 4-8% of total nektonic biomass during period of high abundance.

In terms of total ocean nektonic biomass, salmon represents a small proportion. Prince William Sound hatcheries release about 800 million pink salmon fry or 3% of total pink salmon numbers in Pacific Rim. Extrapolation of PWS pink salmon biomass as a proportion of total nektonic biomass would be a tiny fraction of one percent.

McMillan J., et.al. *A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*¹⁷

This study synthesized findings from 206 peer-reviewed publications worldwide to examine the impact hatcheries have on wild salmonids. While the effects have been reported to range from adverse to beneficial, a substantial 70% of these studies reported adverse effects, whereas 13% recorded minimally adverse effects. These articles discuss various species across North America, Europe, and Asia, offering useful context and discussion points from 50 reviewed publications.

¹⁵ High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate. Wertheimer & Heard

¹⁶ Shuntov, V. P., Temnykh O., and Ivanov O. 2017. On the persistence of stereotypes concerning the marine ecology of Pacific salmon (*Oncorhynchus spp.*). Russian Journal of Marine Biology 43:1–28.

¹⁷ McMillan J., et.al. *A global synthesis of peer-reviewed research on the effects of hatchery salmonids on wild salmonids*

The synthesis, originally composed of 11,000 research papers, was boiled down to a scorecard segregating the papers into categories - adverse, middling, and favorable. However, only a handful of these papers apply to Alaska, rendering percentage-based evaluation a rather peculiar methodology to gauge research validity. Most salmon research funding is directed towards the Pacific Northwest, known to yield negative outcomes due to the strategies employed aiming to rehabilitate wild salmon in the Columbia River Basin in particular. The forthcoming evaluation will largely encompass aggregated critiques of the Ruggerone and McMillan papers.

III. Alternative Research and Perspectives

Wertheimer A. & Heard B. 2018 *High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate*

As mentioned, the 2018 Wertheimer paper will be resubmitted as a separate public comment, although updated with a cover memorandum that highlights additional information which further supports our contentions contained herein. The most significant event that has changed since 2018 is the Marine Heat Wave (MHW) that encompassed 2016 – 2019 and significantly affected adult chum and to a lesser extent pink salmon returns and survival in 2020 – 2022. During this period there were four years in which there were five federal fishery disaster designations in Alaska.¹⁸

- S.E. Alaska, Norton Sound, Yukon River, Chignik, Kuskokwim salmon fisheries, 2020 & 2021
- Copper River and PWS salmon fisheries, 2018 & 2020
- Gulf of Alaska pink salmon fisheries in PWS, Kodiak, Chignik, Lower Cook Inlet, S.E. Alaska & Yakutat, 2016

Research by International Year of the Salmon (IYS) demonstrates a strong linkage between the MHW years and return years for chum salmon. These research results will be covered in a

¹⁸ <https://www.adfg.alaska.gov/index.cfm?adfg=hottopics.fisherydisasters>

section to follow. Significantly, it's worth noting that salmon productivity varies regionally and locally in Alaska and across the Pacific Rim; an issue we will delve into in this document.

IV. Review of Research Papers and Possible Mechanistic Effects for Salmon Dynamics

Howard K., October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research*. A presentation to Board of Fisheries.¹⁹ and International Year of the Salmon²⁰

In her presentation to the Board of Fisheries in October 2023, Dr. Howard provided a balanced assessment of the latest studies regarding salmon abundance, winter range, and oceanic sampling conducted by the International Year of the Salmon (IYS) researcher group. She also reviewed significant findings reported by the Northern Hemisphere Pink Salmon (Expert Group), an international body former by NPAFC. Both the IYS and the Expert Group are recent initiatives by the NPAFC aimed at addressing data gaps in our understanding of salmonids. Particularly noteworthy is the significant gap regarding the winter range and location of salmonids in the North Pacific, a point that was encapsulated in Howard's oral report.

The prevailing scientific consensus is that diet overlap exists among salmonids and nektonic fishes and avians. This overlap correlates to variations in species growth patterns and abundance. High survival rates of one species can coincide with a decline in another. Likewise, when one species thrives in abundance, the growth of another may decrease. For instance, high abundance of odd-year pink salmon can affect the growth rate of sockeye salmon in their third year at sea. While this does not necessarily affect survival, it does impact growth and hence reproduction rates. Such abundance associations also seem to affect salmon age at maturity; when one species is abundant, another's age of maturity may increase. As shown in Oke, et.al.²¹

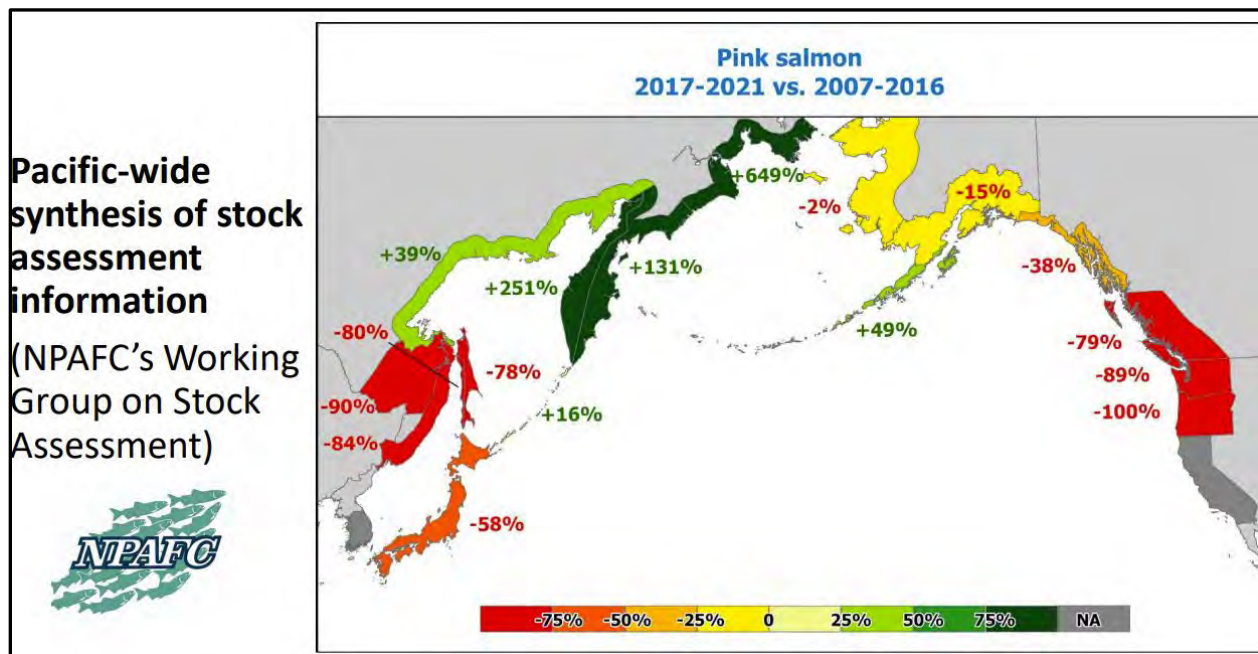
¹⁹ Howard K., Alaska Department of Fish and Game, October 2023 *Overview of Scientific Understanding of Salmon Competition at Sea and an Update on Research*. Presentation to Board of Fish

²⁰ <https://yearofthesalmon.org/resources/>

²¹ Oke K., et.al. 2020 Recent declines in salmon body size impact ecosystems and fisheries

research, Alaska's pink and chum salmon may competitively impact coho salmon, irrespective of climate factors.

However, not all researchers agree on these findings. The Ruggerone paper and its proponents, predominantly based in the United States, argue that correlations between wild and hatchery pink salmon and the decline of other species present a problem. In contrast, the broader international research community remains unconvinced of these negative associations. To establish causality, mechanistic or direct evidence is crucial. Yet, the drive for funding and publication all too often leads to what is called by researchers as publication bias. Additionally, publication bias often results in nonnegative-relationships or null results not being published. The following discussion provides some perspective on the contrast between the proponent's arguments of corollary associations versus the body of research that points to drivers and/or mechanisms linked to empirical evidence.

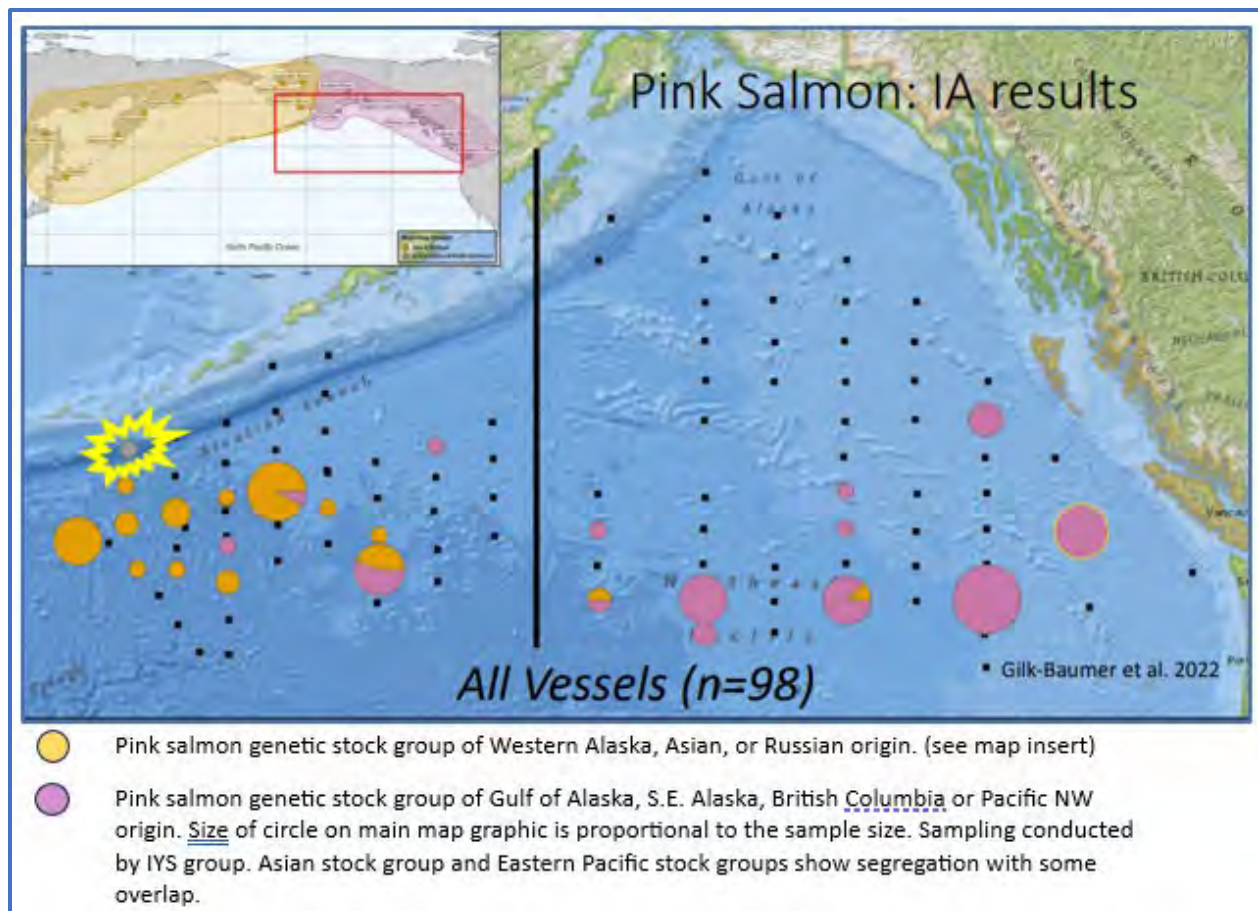


The Pacific Ocean, a vast expanse, is not uniform in terms of productivity, climate, temperature, and biological parameters. Evidence from the study of the Pacific Decadal Oscillation (PDO)²²

²² Mantua, N. et.al. 2001. The Pacific Decadal Oscillation

suggests significant shifts in productivity in the eastern Pacific, alternating between favoring the northeastern Pacific and the eastern Pacific south of British Columbia over different decades. The NPAFC's working group on pink salmon stock assessment observed significant shifts in pink salmon productivity across the Pacific Rim when comparing the period of 2017–2021 with that of 2007–2016. The accompanying map above illustrates these dramatic differences. Productivity of pink salmon in Russia increased two to six-fold, while in the Pacific Northwest (PNW), productivity declined by half. Most of Alaska also experienced a decline, albeit more modestly. It is worth noting again that during this period of decline, Alaska requested at least five federal disasters.

The International Year of the Salmon, which conducted research from 2018–2022, provided valuable information on salmonids' winter distribution across the Pacific from East to West. Genetic stock identification of salmon tissue samples taken across the Pacific revealed the country of origin, both wild and hatchery. This research sheds light on one of the mysteries of



the recent Yukon and Kuskokwim chum salmon decline. The Coastal Western Alaska Kodiak (CWAK) chum stock group (which includes Yukon, Kuskokwim, Bristol Bay, Norton Sound) were found to be unhealthy, with low fat content and empty stomachs for not just one winter, but two consecutive winters. These samples were taken during the Marine Heat Wave (MHW) years, which presaged the disastrous returns to the Yukon and Kuskokwim in 2020–2022.

Another crucial finding from the International Year of the Salmon (IYS) winter ocean studies is discernible from the map graphic presented above. The graphic clearly shows that pink salmon from Russia and Asia were primarily located in the western Pacific, while their Alaskan and Pacific Northwest (PNW) counterparts were predominantly in the eastern Pacific. There was some overlap, but it was minimal during the sampled years. **Shuntov et. al. observed that prey abundance for salmon was not a limiting factor.** It's worth noting that this period coincided with the all-time high of Russian and Central Asian pink salmon, as illustrated in the graphic on the preceding page. These geographical distribution patterns hold significant implications for understanding inter-species dynamics and potential competition for resources and underline the complex interplay of factors contributing to salmon performance across the Pacific.

North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group.²³

In a section on *Competition and Interactions Between Pink Salmon and Other Species* from the report it states: “.....the ocean remains highly productive and pink salmon only consume a small fraction of the resources compared to more abundant species (e.g., walleye pollock). Pink salmon are also flexible foragers, eating a variety of prey and finding preferred feeding areas best suited to their traits. Indeed, the foraging areas and feeding habits among Pacific salmon species often indicate complimentary, rather than competitive, interactions.”²⁴ This section included references that competition for prey can negatively affect other species at times.

²³ <https://www.npafc.org/wp-content/uploads/technical-reports/Technical-Report-21.pdf>. North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group

²⁴ <https://www.npafc.org/wp-content/uploads/technical-reports/Technical-Report-21.pdf>. North Pacific Anadromous Fish Commission Technical Report No. 21, 2023, Pink Salmon Expert Group

Baumann, et.al 2014, *Diatom control of the autotrophic community and particle export in the eastern Bering Sea during the recent cold years (2008–2010)*²⁵

A body of research conducted in the Bering Sea challenges assertions of pink salmon exercising top-down control, instead suggesting a cold-water control mechanism at work. This research focuses on examining mechanistic linkages to explain nutrient transportation during periods of cold water, offering potential explanations for the cause-and-effect dynamics. Its significance lies in potentially shedding light on why nutrient availability dwindles during warm, ice-free years.

The study's main finding suggests that during cold years, diatoms emerge as dominant primary producers and particle exporters in the eastern Bering Sea. Zooplankton fecal pellets also played a crucial role in the particle export dynamic. These diatoms, which constitute a minimum of 70% of the vertical flux of total Chlorophyll a (TChl a), are the primary algal class to be exported from the light-exposed upper layers of the ocean, or 'photic zone', regardless of the TChl a and Particulate Organic Carbon (POC) flux.

The extent of particle flux from early spring to late spring and early summer may be largely dictated by zooplankton grazing. Early summer particle export is likely associated with the sinking phenomenon, typically observed in spring, and the Marginal Ice Zone (MIZ) primary production.

Daly, et.al. *Potential for resource competition between juvenile groundfishes and salmon in the eastern Gulf of Alaska, 2019* ²⁶

Evidence suggests that juvenile salmon, including pink salmon, were not causing a 'top-down' zooplankton resource bottleneck in the Gulf of Alaska. Based on the available zooplankton

²⁵ Matthew S. Baumann, S. Bradley Moran, Michael W. Lomas, Roger P. Kelly, Douglas W. Bell, and Jeffrey W. Krause Diatom control of the autotrophic community and particle export in the eastern Bering Sea during the recent cold years (2008–2010)

²⁶ Elizabeth A. Dalya, Jamal H. Moss, Emily Fergusson, Richard D. Brodeur Potential for resource competition between juvenile groundfishes and salmon in the eastern Gulf of Alaska. 2019

biomass, there appeared to be no reduction in the prey population due to excessive grazing by planktivorous (plankton-eating) juvenile fish where these prey were most abundant.

Interestingly, the years 2010-2012 saw a significant increase in juvenile groundfish when the numbers of young, carnivorous salmon were lower. This raises questions about potential predation.

The paper explores these complex dynamics between juvenile groundfish and salmon in the Gulf of Alaska. It suggests that competition for prey (zooplankton) resources may be underway, potentially impacting the early marine growth and survival of these fish species, but the effect is not top-down control.

From the abstract of the paper

“Neither the abundance nor stomach fullness of the juvenile planktivorous ground fishes or salmon correlated with station-level zooplankton biomass in 2012–13, **suggesting a lack of a resource bottleneck** (emphasis added) for these planktivores in these 2 years.” and “Overall, during years when juvenile ground fishes survival was high, juvenile salmon survival was also high, suggesting sufficient food resources in the GOA”.

Hunt and Stabeno, *Climate change and the control of energy flow in the southeastern Bering Sea*. 2002²⁷

The Oscillating Control Hypothesis presented in this paper anticipates that the abundance of forage fish will be determined by a mix of bottom-up processes, (affected by the availability of zooplankton prey), and top-down processes, (influenced by predation by large fish-eating fish).

The shift of Bering Sea ice in spring dictates the occurrence of either an early ice-associated bloom in cold water or a late-spring open water bloom in relatively warmer water. Copepods, small crustaceans that serve as critical feed for young pollock, are sensitive to the water temperature in which they are developing. Consequently, copepod reproduction and the number of generations produced are notably higher in years with warm water spring bloom compared to cold water bloom years. This variation can significantly influence the growth and production of zooplankton, as well as the growth and survival rate of young fish.

²⁷ Hunt G., and Stabeno P. Climate Change and the control of energy flow in the southeastern Bering Sea 2002.

This study lends further evidence to the Ocean Climate Hypothesis, which envisages that the system should predominantly be **constrained by bottom-up fish recruitment** limitation during repeated cold springs associated with ice-formed blooms. Examining the environmental variability from the 1990s, the paper validates that attributes such as average depth temperatures are crucial for zooplankton and pollock. The study also notes a correlation between the biomass of adult pollock on the shelf and the productivity of Pribilof Island-nesting black-legged kittiwakes, a sea bird species whose presence often indicates a healthy fish population.

Arimitsu, et.al. *Heatwave-induced synchrony within forage fish portfolio disrupts energy flow to top pelagic predators.* 2021²⁸

Contrary to expectations, during the recent anomalously warm conditions, which are thought to have resulted in top-down pressures controlling forage fish abundance in the northern Gulf of Alaska, **salmon were not the primary predators.**

This research paper delved into the impacts of the 2014-2016 Pacific marine heatwave on forage fish in the Gulf of Alaska. The researchers discovered that the measure of covariance among species within a community, a concept referred to as the 'portfolio effects' of forage fish species, could serve as an analytical framework for understanding the stability of ecosystem dynamics over time. They also found that the heatwave-induced extreme mortality of common murre was mitigated by the flexible foraging behavior of avian predators.

One critical finding underscores the vulnerability of fishes' demographic structure, which changes in response to size-selective removal processes, whether through predation, disease, or fishing. This change weakens the population's ability to buffer environmental variability, leading to poor recruitment and subsequently, low survival rates. It can also impact spawning dynamics as smaller, younger individuals, which produce fewer eggs, rise in population. The quantity of produced eggs, or fecundity, is strongly related to size.

²⁸ Arimitsu M., et.al. Heatwave-induced synchrony within forage fish portfolio disrupts energy flow to top pelagic predators 2021,

Sturdevant, M. et.al. 2011. *Lack of trophic competition among wild and hatchery juvenile chum salmon during early marine residence in Taku Inlet, Southeast Alaska* ²⁹

A research paper conducted a comparative analysis of the diets of wild and hatchery chum salmon in the littoral habitat of outer Taku Inlet, near Juneau, Alaska. Findings from the study revealed significant variances. The diet of wild chum salmon consisted of more insects, larvaceans, barnacle and euphausiid larvae, gammarids, large and small calanoids, and fish compared to their hatchery counterparts. Hatchery fry consumed similar prey but in different quantities, the first-year diet containing more gammarids and hyperiids than the wild fry, while in the second year consuming a higher proportion of calanoid copepods. The study also concluded that the diet composition of both wild and hatchery chum salmon showed more similarity within the same year than across different years. Further, the diets of these fish in the inner-middle locations of Taku Inlet showed more similarity than those in the outer area.

The research also observed an interesting trend in the condition of hatchery chum salmon. Upon release, these **hatchery fish were larger and had a higher energy density than the wild salmon**. However, in the early weeks post-release, as they adapted to a diet constituted by wild prey, they exhibited a **drop in their condition. Approximately forty days later, their energy densities had not only recovered but had also aligned with those of the wild salmon**. Importantly, they showed higher energy densities as compared to the time of release in Taku Inlet. This research provides insights that could inform methods to improve the adaptability and survival rate of hatchery chum salmon post-release.

²⁹ Lack of trophic competition among wild and hatchery juvenile chum salmon during early marine residence in Taku Inlet, Southeast Alaska 2011. Sturdevant M., Fergusson E., Hillgruber N., Reese C., Orsi J., Focht R., Wertheimer A., & Smoker B.

Batten S., 2022. *Responses of Gulf of Alaska plankton communities to a marine heat wave.*³⁰

The Batten paper published in 2022 postulates possible mechanisms causing lower productivity brought on by the marine heat wave (MHW) in the North Pacific Gulf of Alaska. The abstract lays out their findings:

Time series of phytoplankton and zooplankton collected from the shelf and oceanic northern Gulf of Alaska from 2000 to 2018 are examined to describe changes in abundance and composition that occurred during the 2014–2016 marine heat wave (MHW). Zooplankton abundances were very high on the shelf during the MHW, particularly copepods and pteropods, while large diatoms were very low. Community Temperature Indices (CTI) were derived and showed significant, positive correlations with temperature for both trophic levels on the shelf and in the deep ocean. While no common taxa disappeared from the communities, there were changes in relative abundance that contributed to the increase in CTI. Additionally, some rarer taxa were not found during or after the MHW, and fewer new taxa appeared with its onset. There is thus evidence for a change in ecosystem functioning in the lower trophic levels with the northeast Pacific MHW bringing; lower plankton taxonomic richness, a bias towards species that prefer warm conditions, increased effects down the food chain, likely exerted by changes in forage fish, and uncertainty in data from 2017 to 2018 as to whether plankton metrics had, or would, return to pre-MHW values.

Orsi J., 2005. *Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions*³¹

The study estimated the total abundance of hatchery and wild chum salmon in northern southeast Alaska region. The total prey consumption varied depending on mortality rate assumptions, but the salient point is **only a small percentage of available zooplankton was consumed by juvenile chum salmon**. The study noted the need for additional research to determine physiological input parameters and improve abundance and mortality estimates. The abstract details the scope of work, findings and possible limitations:

Bioenergetics modeling was used to estimate zooplankton prey consumption of hatchery and unmarked stocks of juvenile chum salmon (*Oncorhynchus keta*) migrating seaward in littoral (nearshore) and neritic (epipelagic offshore) marine habitats of southeastern Alaska. A series of model runs were completed using biophysical data collected in Icy

³⁰ Batten S., Ostle C., Helaouet P., Walne A. 2022. Responses of Gulf of Alaska plankton communities to a marine heat wave.

³¹ Orsi J., Wertheimer A., Sturdevant M., Fergusson E., Mortensen D., & Wing B. 2005. Juvenile chum salmon consumption of zooplankton in marine waters of southeastern Alaska: a bioenergetics approach to implications of hatchery stock interactions

Strait, a regional salmon migration corridor, in May, June, July, August, and September of 2001. These data included a temperature (1-m surface versus surface to 20-m average), zooplankton standing crop (surface to 20-m depth versus entire water column), chum salmon diet (percent weight of prey type consumed), energy densities, and weight. Known numbers of hatchery releases were used in a cohort reconstruction model to estimate total abundance of hatchery and wild chum salmon in the northern region of southeastern Alaska, given average survival to adults and for two different (low and high) early marine littoral mortality rate assumptions. **Total prey consumption was relatively insensitive** to temperature differences associated with the depths potentially utilized by juvenile chum salmon. However, the magnitudes and temporal patterns of total prey consumed differed dramatically between the low and high mortality rate assumptions. Daily consumption rates from the bioenergetics model and CPUE abundance from sampling in Icy Strait were used to estimate amount and percentage of zooplankton standing crop consumed by mixed stocks of chum salmon. We estimated that only **a small percentage of the available zooplankton was consumed by juvenile chum salmon**, even during peak abundances of marked hatchery and unmarked mixed stocks in July. Total daily consumption of zooplankton by all stock groups of juvenile chum salmon was estimated to be between 330 and 1764 g/km²d¹ from June to September in the neritic habitat of Icy Strait. As with any modeling exercise, model outputs can be misleading if input parameters and underlying assumptions are not valid; therefore, additional studies are warranted, especially to determine physiological input parameters, and to improve abundance and mortality estimates specific to juvenile chum salmon. Future bioenergetics modeling is also needed to evaluate consumption by the highly abundant, vertically migrating planktivores that co-occurred in our study; we suggest that these fishes have a greater impact on the zooplankton standing crop in Icy Strait than do hatchery stock groups of juvenile chum salmon.

Shuntov, V. 2017. *On the persistence of stereotypes concerning the marine ecology of Pacific salmon (Oncorhynchus spp.).*³²

Shuntov et.al. discusses marine ecology of Pacific salmon, including their interaction with sea surface temperatures, food shortages, competition, effect on other species, and habitat restrictions. These Western-centric ideas and syntheses of data are contrary to the research findings from the Pacific Research Fisheries Center (TINRO Russia). Pacific salmon have a wide range of habitats and can adapt to various temperatures. They can migrate vertically and have a diverse diet. These salmon are dispersed and can satisfy their dietary needs across large areas with low prey concentrations. **“The total biomass of all the Pacific salmon species** in the North Pacific is not greater than 4–5 million t (including 1.5–2.0 million t in Russian waters). In stark

³² Shuntov, V. P., Temnykh O., and Ivanov O. 2017. *On the persistence of stereotypes concerning the marine ecology of Pacific salmon (Oncorhynchus spp.).* Russian Journal of Marine Biology 43:1–28.

contrast, the biomass of other common nekton species is estimated at a few hundred million tons. **Salmon account for 1.0–5.0% of the total amount of food consumed by nekton** in the epipelagic layer of the western Bering Sea. In summary, they play a moderate role in the food webs of subarctic waters based on their research delineated in the abstract:

Some of the views on the marine ecology of Pacific salmon (*Oncorhynchus* spp.) that were popular in the second half of the 20th century are discussed critically: the absolutization of the influence of sea surface temperature on distribution of salmon and strength of their year classes, as well as the conclusions on the shortage of food (particularly in winter) and the fierce competition for food, the “suppression” of other salmon species and one adjacent broodline by pink salmon, the limited carrying capacity of the pelagic zone of subarctic ocean waters for salmon, the distortion of the structure of epipelagic communities in ecosystems of the North Pacific due to the large-scale stock enhancement of chum salmon, etc. Most of these ideas have not been confirmed by the data of long-term monitoring conducted in the form of complex marine expeditions by the Pacific Research Fisheries Center (TINRO Center) in the Far-Eastern Seas and adjacent North Pacific waters since the 1980s. The data show that Pacific salmon are ecologically very flexible species with a wider temperature range of habitat than was previously believed. Salmon are able to make considerable vertical migrations, easily crossing zones of sharp temperature gradient and different water masses. Having the wide feeding spectra and being dispersed (as non-schooling fish) when feeding in the sea and ocean, they successfully satisfy their dietary needs in vast areas even with relatively low concentrations of prey organisms (macroplankton and small nekton). The total biomass of all the Pacific salmon species in the North Pacific is not greater than 4–5 million t (including 1.5–2.0 million t in Russian waters), whereas the biomass of other common species of nekton is a few hundreds of millions of tons. Salmon account for 1.0–5.0% of the total amount of food consumed by nekton in the epipelagic layer of the western Bering Sea, 0.5–1.0% in the Sea of Okhotsk, **less than 1% in the ocean waters off the Kuril Islands, and 5.0–15.0% in the ocean waters off East Kamchatka**. Thus, the role of Pacific salmon in the trophic webs of subarctic waters is rather moderate. Therefore, neither pink nor chum salmon can be considered as the species responsible for the large reorganization in ecosystems and the population fluctuations in other common nekton species.

V. Precautionary approach

The State of Alaska statutes, alongside Alaska Department of Fish and Game regulations, has adopted a precautionary approach to salmon enhancement. Concurrently, the PNP associations have cooperated closely with the department to develop programs that minimize interactions with wild stocks.

The State captured concerns about the possible local effects of introgression – gene flow from hatchery fish to wild fish - in its 1985 genetics policy.³³ In 2011, in response to the request from the PNPs to the Commissioner of Fish and Game, a science panel was established to investigate the introgression caused by hatchery strays into wild stock streams. After twelve years of consistent study and monetary investment of over \$20 million, this science panel has been actively sharing its findings with the Board and the wider public. Discussions are currently underway between the ADF&G and PNP operators about the next phase of research.

VI. Concluding Remarks

Over the past 25 years, Alaska salmon have demonstrated remarkable abundance (except for Chinook) which has raised concerns about possible exceedances of the ocean's carrying capacity. The high abundance and variability of these salmon populations appear to be largely due to oceanic survival conditions rather than density-dependent interactions. Over the last quarter-century, Alaska's salmon harvest has maintained consistently high yields from wild stocks, supplemented by substantial contributions from hatchery fish. While density-dependent interactions have been observed at various salmon life stages and in different habitats, these interactions have not inhibited the salmon population's recovery from its 1970's low levels.

However, fluctuating climate patterns and oceanic events, such as marine heatwaves in the Gulf of Alaska, potentially have wide-reaching implications for salmon populations. These events underscore the unpredictable nature of ocean conditions that influence salmon at both local and regional scales.

³³ https://www.adfg.alaska.gov/static/fishing/PDFs/research/genetics_finfish_policy.pdf

Empirical support in favor of hatchery fish comes from the enhancement programs in Prince William Sound (PWS) and Southeast Alaska. Despite variable productivity over the past few years, both wild and hatchery pink salmon have closely tracked the odd-even brood line patterns in PWS in the past six years, the average even-year return for wild pinks in PWS has exceeded five million, a considerable increase from the two-million average wild return twenty years ago. By targeting hatchery fish, wild escapement goals are being met, resulting in new record highs for the harvest and production of both hatchery and wild pink salmon. This suggests that the large-scale release and return of hatchery pink salmon have not undermined the production potential of wild stocks, irrespective of their high or low abundance. A similar story holds true for southeast Alaska wild and hatchery chum salmon.

Thank you for your time, your interest, and most importantly, your dedication to ensuring an enduring legacy for future generations of salmon and the people of Alaska. We appreciate your commitment to understanding the complex dynamics of our freshwater and marine ecosystems and look forward to continuing an exchange of knowledge and perspectives.

Sincerely,

Alaska's PNP Salmon Hatchery Operators

Kodiak Regional Aquaculture Association
Tina Fairbanks, Executive Director

Valdez Fisheries Development Association
Mike Wells, Executive Director

Cook Inlet Aquaculture Association
Dean Day, Executive Director

Northern Southeast Regional Aquaculture Association
Scott Wagner, General Manager

Prince William Sound Aquaculture Corporation
Geoff Clark, General Manager/CEO

Southern Southeast Regional Aquaculture Association
Susan Doherty, General Manager

Douglas Island Pink & Chum
Katie Harms, Executive Director

Board of Fisheries

October 15-16, 2018

Work Session Anchorage, Alaska

Dear Chairman Jensen and Board of Fish Members:

In the interest of understanding the complex topic of Ocean Carrying Capacity (OCC) this document written by two career fisheries research scientists is presented.

High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate

Alex Wertheimer, NOAA Fisheries Research Biologist (retired)¹
Fishheads Technical Services

William Heard, NOAA Fisheries Research Biologist (retired)²

EXECUTIVE SUMMARY

The abundance and biomass of wild and hatchery pink, sockeye, and chum salmon in the North Pacific Ocean has been higher in the past 2.5 decades (1990-2015) than at any time in the 90-year time series. The high biomass has been remarkably consistent from 1990-2015. There has been higher variability in numbers of salmon than in biomass due to the variability in pink salmon abundance. The high sustained abundance and biomass is driven in no small part by historically high abundance of Alaska salmon, and corresponds with the renaissance of Alaska salmon fisheries from their nadir in the 1970s. Statewide commercial catches of salmon were just 22 million fish in 1973; for 1990-2015, statewide catches have averaged 177 million salmon, an eight-fold increase.

This remarkable recovery and historically high abundance of Alaska salmon can be attributed to five major factors: (1) large expanses of relatively pristine and undeveloped habitats; (2) salmon management policies that have evolved since statehood; (3) the elimination of high seas drift-net fisheries; (4) production from large-scale hatchery programs designed and managed to supplement natural production; and (5) favorable environmental conditions associated with the 1977 “regime shift” affecting the ecosystem dynamics of the North Pacific Ocean. Habitat, management, and enhancement set and maintain the productive capacity that responds to marine environmental conditions: ocean “carrying capacity”.

Carrying capacity has been defined as the ability of an ecosystem to sustain reproduction and normal functioning of a set of organisms. Ocean carrying capacity for Pacific salmon is not a fixed productivity limit, and the considerable regional and temporal variability in salmon stocks is a response to non-homogeneous ocean conditions. Over the past few decades, conditions in the North Pacific Ocean have

been generally favorable to Pacific salmon as reflected by the sustained high abundances and catches. However, extremes in survival and production have occurred both temporally and geographically. Survival and year-class strength of salmon is the result of responses to local, regional, and basin scale conditions. Marine conditions vary geographically and temporally within a given year, interannually, and in the context of oceanographic regimes favorable or unfavorable to salmon production.

There are concerns that the high abundance in the North Pacific Ocean, coupled with high variability in stock performances, indicate that carrying capacity is being exceeded, and that competitive interactions are negatively affecting growth and survival. These concerns have been raised for over 20 years. Rather than indicate that carrying capacity has been exceeded, the trend of the past three decades show that the North Pacific Ocean has had the capacity for the recovery and sustained production of wild stocks while supporting the expansion of large-scale enhancement production from Japan (chum salmon) and Alaska (chum and pink salmon).

A proposed mechanism for negative impacts of high abundance of salmon in the ocean is that their feeding capacity alters the biomass of oceanic zooplankton, and in turn the phytoplankton biomass. In this scenario, this “trophic cascade” and alteration of food webs then negatively impacts other species, including coho and Chinook salmon. The record numbers and abundance of Pacific salmon can appear to be an imposing load on the North Pacific Ocean ecosystem. However, assessments of nektonic trophic structure in the Gulf of Alaska and the western North Pacific Ocean indicate that salmon have low to moderate impacts on oceanic food webs, and they respond to, rather than control, changes in ocean productivity.

Pink salmon have been identified as a keystone predator restructuring oceanic food webs to the detriment of other species. Four lines of evidence call this conclusion into question. First, Russian researchers report that in extensive ocean research programs, they have found typically no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop. Second, high numbers of pink salmon in the North Pacific Ocean have been associated with record run sizes and continued sustained biomass of salmon, rather than a reversal in these trends when pink salmon abundance increased. Third, pink salmon have shown the greatest variation in abundance among Alaska salmon, especially in response to anomalous ocean conditions. Thus rather than restructuring the food webs, they appear to be the most sensitive to changes in marine conditions. Finally, the high predation pressure of pink salmon in the context of epipelagic food webs is justified because other species, especially chum and sockeye salmon, switch to other, poorer quality prey items when pink salmon are abundant. However, the obvious implication is that these other species will “switch back” to the prey with higher nutritional value when pink salmon are at lower levels of abundance. Because chum and sockeye salmon comprise almost 80% of the oceanic biomass of salmon, salmon predation pressure on the “high value” prey remains relatively constant.

Effects of pink salmon abundance are often used as a proxy for deleterious effects of large-scale enhancement in general. In fact, while pink salmon are the most numerous of the salmon species in the North Pacific Ocean, wild stocks of pink salmon contribute some 85% of the overall abundance.

Density dependent interactions have been identified within and between species of salmon. These interactions have been observed during both periods of low and high abundance. Changes in size, survival and age at maturity have been attributed to these interactions. Despite the existence of

competitive interactions in the marine environment, high productivity of Alaska salmon has persisted during this period of high abundance. In general, size declines of pink and chum salmon occurred prior to the 1977 regime shift, and thus are associated with poorer ocean conditions rather than ocean abundance of salmon, and sockeye salmon size has been stable over the past 60+ years.

There is also concern that the high ocean abundance of the big three (pink, chum, and sockeye salmon) negatively impact coho and Chinook salmon in Alaska. For coho salmon, size declines in Southeast Alaska have been linked to pink salmon abundance in the Gulf of Alaska, while in Canada recent size increases in coho salmon have been positively associated with the combined biomass of pinks, chums, and sockeye salmon. The high correlation of run strength between coho and pink salmon in Southeast Alaska is strong evidence that their abundance is driven by similar overall response to shared marine conditions. Density-dependent mechanism other than competition may also play a role in pink salmon/coho salmon dynamics. These include such as predator sheltering of coho salmon juveniles by the more abundant pink salmon juveniles (decreasing predation on coho juveniles), predator aggregation (increasing predation on coho juveniles), and direct predation of coho juveniles and adults on pink salmon juveniles.

Chinook salmon stocks in Alaska have been depressed in recent years due to reduced marine survival, and have declined in size at age for older fish, and age at maturity. These changes are not likely driven by the high abundance of salmon in oceanic habitats. Chinook salmon, by their propensity to utilize deeper depth strata and distribute more broadly on shelf and slope areas during marine residency, are segregated to a large degree from other salmon in their use of ocean habitats with correspondingly different temperatures, prey fields, and predator complexes. Size of Chinook salmon at ocean age 2 has not declined, indicating no density-dependent effect on growth through the first two years at sea. Size declines at older ages are more consistent with selective removal of older, larger fish.

Survival declines of Chinook salmon occurred well into the period of high ocean biomass. There is substantial evidence that much of the variation in Chinook salmon marine survival is due to conditions in the first summer and winter at sea. Changes in the North Pacific ecosystem, such as increased killer whale predation, could introduce more mortality at older ages, and further depress realized survival during periods of poorer environmental conditions for Chinook salmon.

Favorable ocean conditions rather than density-dependent interactions seem to be driving both the high abundance at the basin-scale and the high variability in salmon populations at local and regional scales. Recent climatic and oceanographic events such as the marine heat waves of 2004/2005 and 2014/2015 in the Gulf of Alaska are demonstrative of the intrinsic variability of ocean conditions affecting salmon at local and regional scales. Will density-dependent interactions become increasingly important if and when ocean conditions become less favorable to salmon, with large releases of hatchery fish putting wild stocks in more jeopardy? Or will hatchery fish provide a buffer to sustain fisheries when wild stock productivity is low in response to varying environmental conditions? We conclude the latter, because there is empirical evidence that large releases and returns of hatchery pink salmon in years of both low and high wild stock abundance did not limit the production potential of the wild stocks.

Introduction

The Alaska Board of Fisheries (BOF) was recently petitioned to hold an emergency meeting asking the BOF to amend actions taken in Permit Alteration Requests (PARs) made by the Prince William Sound (PWS) Regional Planning Team and deny the increase in the number of pink salmon eggs taken in 2018 by 20 million eggs. One of the rationales the petitioners used for rescinding the PAR was "... great concern over the biological impacts associated with continued release of very large numbers of hatchery salmon into the North Pacific Ocean, including the Bering Sea and the Gulf of Alaska." To support this concern, the petitioners provided references to record high abundance and biomass of salmon in the North Pacific, as well as possible density-dependent effects of pink salmon on the trophic structure in the North Pacific Ocean and intra-specific and interspecific competition of pink salmon with other species of salmon and seabirds.

The BOF held the emergency meeting on July 17, 2018, and denied the request for rescinding the PAR. The BOF determined there was no need for such an emergency action, and deferred further consideration to the review of the State's salmon enhancement program scheduled for the October 2018 work session. The intention of that review is for members of the BOF to educate themselves about the program and understand the science the enhancement program is predicated on and the current scientific evaluation.

This paper provides a brief, broad overview of the issue of record abundance and biomass of Pacific salmon and the implications for the status of Alaska salmon. We present this overview in six sections. The first is a review of the recent information on abundance of salmon in the North Pacific. The second is an examination of trends in harvest of Alaska salmon, including enhanced production. The third is a discussion of oceanographic conditions and the concept of "carrying capacity" for salmon in the North Pacific. The fourth is a perspective on the relative role of salmon as a component of the North Pacific ecosystem. The fifth looks at intra- and interspecific competition and density dependence among salmon species, and its possible impacts on growth and abundance. The sixth section summarizes our conclusions from this overview.

I. High Abundance and Biomass of Salmon in the North Pacific Ocean

In a recent paper, Ruggerone and Irvine (2018) published an excellent compendium of the available data on numbers and biomass of pink, chum, and sockeye salmon in the North Pacific Ocean over the time period 1925 through 2015. The authors have compiled diverse data sources of harvest, harvest rates, and escapement. They have used reasonable approaches to estimating total salmon escapements by species by region, and to estimate hatchery and wild origins.

They found that the abundance and biomass of pink, sockeye, and chum salmon has been higher in the past 2.5 decades (1990-2015) than at any time in the 90-year time series, averaging 665 million adult salmon each year ($1.32 \times$ million metric tons) during 1990–2015 (Figure 1). During 1990–2015, pink salmon dominated adult abundance (67% of total) and biomass (48%), followed by chum salmon (20%, 35%) and sockeye salmon (13%, 17%). When immature salmon biomass was included in the biomass estimates, biomass was dominated by chum salmon (60% of the combined biomass of all three species),

followed by pink salmon (22%) and sockeye salmon (18%).

The high biomass has been remarkably consistent over the 1990-2015 time period. There has been higher variability in numbers of salmon than in biomass due to the variability in pink salmon abundance.

Alaska produced approximately 39% of all pink salmon, 22% of chum Salmon, and 69% of sockeye salmon, while Japan and Russia produced most of the remainder. Approximately 60% of chum salmon, 15% of pink salmon, and 4% of sockeye salmon during 1990–2015 were of hatchery origin. Alaska generated 68% and 95% of hatchery pink salmon and sockeye salmon, respectively, while Japan produced 75% of hatchery chum salmon. Salmon abundance in large areas of Alaska (PWS and Southeast Alaska), Russia (Sakhalin and Kuril islands), Japan, and South Korea are dominated by hatchery salmon. During 1990–2015, hatchery salmon represented approximately 40% of the total biomass of adult and immature salmon in the ocean.

In the context of concern for the impacts of hatchery fish on wild salmon and the North Pacific ecosystem, we reiterate three facts about pink salmon noted above. Pink salmon are the most abundant of the species, have the greatest temporal variability in abundance, and are mostly (85%) wild origin (Ruggerone and Irvine 2018). As we will discuss below, the high variability of pink salmon and differences in abundance between odd-year and even-year lines is often used to examine competitive interactions and ecosystem level impacts of salmon in the North Pacific. At the basin-scale, to the extent that such effects may occur, effects of pink salmon are predominately from wild-stock populations rather than from enhanced fish.

II. Trends in Harvest of Alaska Salmon

The high sustained abundance and biomass in the North Pacific Ocean reported by Ruggerone and Irvine (2018) is driven in no small part by historically high abundance of Alaska salmon. It is instructive to put the current levels of salmon harvest into perspective of the 115 year time series of Alaska commercial salmon harvests (Figure 2), to recognize the extent of recovery and extraordinary recent productivity of Alaska salmon. In the early 1970's, Alaska salmon harvests were at their nadir, with statewide catches of all species averaging just 22 million fish in 1973 and 1974 (Figure 2). In the “good old days” of the 1930s, catches sometimes exceeded 100 million. The State of Alaska initiated a number of management actions to address the decline and rebuild production (Clark et al. 2006), with a goal of once again reaching harvests of 100 million salmon. In 1971, the Alaska Legislature established the Division of Fisheries Rehabilitation Enhancement and Development (FRED) within the Alaska Department of Fish and Game (ADF&G) for hatchery development. In 1972, Alaska voters approved an amendment to the state Constitution (Article 8, section 15), providing for an exemption to the “no exclusive right of fishery” clause, enabling limited entry to Alaska’s state fisheries and allowing harvest of salmon for broodstock and cost recovery for hatcheries. In 1974, the Alaska Legislature expanded the hatchery program, authorizing private nonprofit (PNP) corporations to operate salmon hatcheries.

Alaska's modern salmon hatchery system started in the 1970s and grew out of depressed fisheries that reached record low harvest levels. At the same time a century old Japanese salmon hatchery system was undergoing dramatic improvements in performance with record high marine survivals of young salmon, increased releases of up to 2 billion juveniles per year, and returns of adult chum salmon ranging from

40 to 60 million fish annually (Kobayashi 1980). These impressive results caught the attention of officials and scientists developing Alaska salmon hatchery program.

Exchanges between Japanese and Alaska scientists, fishermen, and industry helped forge the enhancement strategies and policies in Alaska, resulting in similarities in the two hatchery programs. Similarities include hatcheries operated by private fishermen groups where salmon catches are taxed under a user-pay system to help defray cost of hatchery operations, a focus mostly on pink or chum salmon production, and extensive short-term rearing of pink and chums salmon fry to improve marine survival. However, as reviewed by Heard (2011), there also are significant differences between salmon fisheries, policies, and hatchery operations in the two countries. Commercial salmon fisheries in Japan have been largely dependent on hatcheries while development of hatcheries in Alaska focused on fisheries based on a careful balance between wild and hatchery production (McGee 2004). Some important differences in the two systems include locating Alaska hatcheries on non-anadromous water sources and not on important wild stock river systems, careful selection of brood stocks within a region and restricting use of hatchery brood stocks to specific geographic areas.

Alaska salmon harvests recovered rapidly in the second half of the 1970s, and exceeded 100 million fish by 1980 (Figure 2). With the exception of 1986 (96 million), the statewide catch has been over 100 million salmon annually since 1980. For 1990-2015, harvest has averaged 177 million salmon. After 1980, hatchery production started making up an increasing portion of the harvest. In the last decade (2008-2017), hatchery salmon have composed about 33% of the total commercial harvest, averaging 67 million fish annually (Stophia 2018).

This remarkable recovery and historically high abundance of Alaska salmon can be attributed to five major factors: (1) large expanses of relatively pristine and undeveloped habitats; (2) salmon management policies that have evolved since statehood (Eggers 1992, Clark et al. 2006); (3) the elimination of high seas drift-net fisheries (Clark et al. 2006); (4) production from large-scale hatchery programs designed and managed to supplement natural production (McGee 2004, Stophia 2018); and (5) favorable environmental conditions associated with the 1977 “regime shift” affecting the ecosystem dynamics of the North Pacific Ocean.

III. Ocean Conditions and Carrying Capacity

“Trying to define ocean carrying capacity is like trying to catch a moonbeam in a jar”. O. Gritsenko, VINRO, Moscow. Member, NPAFC Committee on Scientific Research and Statistics.

The recovery of Alaska salmon and the record abundances throughout the North Pacific have been repeatedly linked to changes in ocean conditions characterized as the 1977 regime shift. Warming ocean conditions resulted in striking increases in primary and secondary production (Brodeur and Ware 1992). These changes in temperature and lower-trophic level production were associated with profound changes in species composition of fish and crustaceans (Anderson and Piatt 1999). Salmon as a group benefitted (and are an important component of) these ecosystem level changes, with the dramatic increases in abundance observed around the Pacific rim. The importance of the marine ecosystem to the abundance trends is emphasized by the success of large-scale enhancement systems in both Alaska and

Japan concurrent with the high production of wild stocks from Alaska and Russia. Wild stocks are responding to the effects of climate on both freshwater and marine ecosystems, while variation in hatchery returns for a given level of production is driven entirely by the marine conditions encountered.

Carrying capacity has been defined as the ability of an ecosystem to sustain reproduction and normal functioning of a set of organisms (Farley et al. 2018). For salmon in the ocean, feeding and survival conditions are defined by a complex of physical and biological factors, involving both bottom-up (prey) and top-down (predators) processes (Radchenko et al. 2018). These are dynamic processes, resulting in annual variability in salmon production in the marine environment. The ocean conditions driving these processes vary over both short and long time periods, so that annual variability occurs in the context of “regimes” that can be favorable or unfavorable to salmon (Beamish et al. 1999,2004; Shuntov et al. 2017; Radchenko 2018).

Over the past few decades, “carrying capacity” conditions in the North Pacific Ocean have been generally favorable to Pacific salmon as reflected by the sustained high abundances and catches. However, responses of stocks of Pacific salmon have not been uniform during this period, and extremes in survival and production have occurred both temporally and geographically. Survival and year-class strength of salmon is the result of responses to local, regional, and basin scale conditions, and not a result of a homogeneous ocean carrying capacity (Heard and Wertheimer 2012).

Marine survival of Pacific salmon is more correlated between neighboring populations than with more distant ones (Mueter et al. 2005; Pyper et al. 2005; Sharma 2013), emphasizing the importance of local and regional conditions. The first few months at sea is the period of highest mortality per day for juvenile salmon in the marine environment (Heard 1991; Quinn 2005; Farley et al. 2007, 2018). Variability in mortality during this period can be large, and can be the major driver of year-class strength. An extreme example is the returns of Fraser River sockeye salmon in 2009 and 2010. In 2009, only 1.5 million fish returned, the lowest return since 1947; in 2010, 29 million fish returned, the highest number since 1913. Conditions during the early marine period are considered the primary factor affecting these changes in survival of Fraser River sockeye salmon (Beamish et al. 2012).

Salmon surviving the early marine period are exposed to continued mortality, albeit at a lower rate (Quinn 2005). The first winter at sea has been posited as a critical time period for determining year class strength (Beamish et al. 2004; Moss 2005). Older immature and maturing salmon have much lower mortality rates (Ricker 1976), but these extend over a longer period of time, from 1 year for pink salmon to 5 years for Chinook salmon. Forecasting approaches using juvenile salmon abundance index to predict returns (Wertheimer et al 2017; Murphy et al. 2017) assume that recruitment through the early marine stage has established year-class strength, and that subsequent mortality does not vary substantially from year-to-year. However, Radchenko (2018) reports that cumulative ocean mortality can vary 1.5-2 times. These ocean effects on survival can result in large deviations, positive and negative, from forecasts from juvenile salmon indexes (Figure 3). For 2006, the forecast for Southeast Alaska pink salmon harvest was 35 million fish; the actual harvest was 11 million fish, less than one third of the forecast. In contrast, the pink salmon forecast for 2013 was 53.8 M fish, but the forecast was 43% lower than the actual harvest of 94.7 million fish, the largest harvest since catch records were recorded dating back to 1900 (Figure 3, Figure 4).

These results illustrate that variations in marine survival between different local or regional areas occur in the context of larger basin-scale climatic influences on overall production levels of pink and chum salmon in the GOA. Prevailing basin-scale conditions likely strongly influence environmental factors that favor a higher or lower range or level of potential survival for juvenile salmon from different regions.

The “carrying capacity” encountered by a salmon population is a cumulative effect encompassing different life-history phases. The conditions encountered by the salmon will depend on their geographic origin and their ocean migration patterns, which differ by species and stocks. The ocean is a dynamic environment, with substantial variability throughout the North Pacific basin. In 2013, “carrying capacity” for pink salmon in the Gulf of Alaska (GOA) was high, with strong returns throughout the GOA. Returns in both Southeast Alaska and PWS were at record levels. In contrast, in 2015 pink salmon again returned to PWS in record numbers, while returns in Southeast Alaska were below the 1995-2015 average and below forecasts from juvenile salmon indexes, demonstrative of the regional nature of the response of pink salmon stocks to ocean conditions (nearshore and oceanic).

While the general warming in the North Pacific Ocean has been a feature of the high productivity for salmon (Brodeur and Ware 1992; Mantua et al. 1997; Farley et al. 2018), ocean warming events associated with climate change are occurring with more frequency, often with detrimental impacts on salmon (McKinnell 2017). Recent ocean warming events are associated with the decline of the even-year pink salmon in Southeast Alaska. From 1960 through 2005, there was no clear dominance of even or odd year lines of pink salmon in Southeast Alaska (Figure 4). In the summer of 2005, juvenile pink salmon from SEAK encountered anomalous warm conditions in the Gulf of Alaska (Figure 5). These ocean conditions were associated with the occurrence of neretic fish and invertebrates characteristic of more southern locales, including Humboldt squid, blue shark, Pacific sardine, and pomfret (Wing 2006). The resultant 2006 return was, as noted above, only one-third of forecast, and the lowest since 1988. Even year pink salmon appeared to be recovering relative to the 2006 return, attaining a harvest of 37 million in 2014.

In the winter of 2014/2015, another marine heatwave, aka the warm blob, reached the eastern GOA (DiLorenzo and Mantua 2016). The 2014-brood pink salmon that entered the GOA in 2015 again had poorer than expected survival, attaining only half of the forecast in 2016 (Figure 3). Poor pink salmon returns occurred throughout the Gulf of Alaska in 2016, resulting in a Federal disaster declaration for the fishery. The broad nature of the pink salmon run failure is indicative of shared ocean effects. However, regional and local variability were also apparent. In Southeast Alaska, harvests of pink salmon in the northern area were 20% of the recent 10-year average, whereas in the southern area harvest was 80% of the recent 10-year average. In PWS, much of the catch was supported by fish from Solomon Gulch Hatchery, which was still 50% below forecasts based on average marine survivals. Marine survivals were poorer yet for pink salmon from Prince William Sound Aquaculture Association hatcheries, where returns were less than 20% of forecast (Russell et al. 2017).

The 2005 and 2015 ocean heat waves thus had a broad-scale impact on the carrying capacity for pink salmon in the Gulf of Alaska, with 2015 having a more pervasive impact among regions. Both wild and hatchery fish were affected; the return to SEAK is predominately (> 95%) wild, and the hatchery return

to PWS was the lowest since 1993.

It is noteworthy that despite the poor returns of pink salmon, generally the most abundant species in the Alaska harvest, statewide harvest in 2016 was still above 100 million salmon (Figure 2). Variability in abundance numbers throughout the North Pacific reflects high variability in pink salmon, which appear to be the most sensitive salmon species to annual changes in ocean conditions because of their lack of multiple year-classes at sea.

Ruggerone and Irvine (2018) raised the concern that the high abundance of salmon coupled with variability in stock performances indicates that carrying capacity of the North Pacific Ocean for salmon has been reached or exceeded. This is not the first time such concerns have been raised. Various authors over the past 20 years have posited that high abundance of pink, sockeye, and hatchery chum salmon may have exceeded carrying capacity and be negatively affecting or constraining salmon production (e.g., Peterman et al. 1998; Ruggerone et al. 2003; Davis (2003); Sinyakov (2005, cited in Shuntov et al. 2017). In spite of these concerns, abundance and biomass have continued to be high, reaching record levels in recent years (Figure 1).

As Shuntov et al. (2017) noted, ocean carrying capacity for Pacific salmon is not a fixed productivity limit, and the considerable regional and temporal variability in salmon stocks is a response to non-homogeneous ocean conditions. Rather than indicate that carrying capacity has been exceeded, the trend of the past three decades show that the North Pacific Ocean has had the capacity for the recovery and sustained production of wild stocks while supporting the expansion of large-scale enhancement production from Japan (chum salmon) and Alaska (chum and pink salmon). The sky has not yet fallen. This is not to say that the high abundance will persist indefinitely. The shock of the marine heat waves of 2004/2005 and 2014/2015 to Alaska pink salmon demonstrates that carrying capacity can vary within a productive regime, and reminds us that the status of the current production regime is vulnerable to both gradual and abrupt changes driven by a warming climate. Continued warming could result in contraction of the range of Pacific salmon in the North Pacific Ocean (Welch et al. 1998).

IV. Trophic Position of Salmon in the North Pacific Ecosystem

A major concern over the high abundance of salmon is that their feeding capacity alters the biomass of oceanic zooplankton, and in turn the phytoplankton biomass (Ruggerone and Irvine 2018; Batten et al., in press). This “trophic cascade” and alteration of the food web has been linked to decline in size and abundance of Alaska Chinook salmon and coho salmon (Ruggerone and Irvine 2018; Shaul and Geiger 2016); growth and diet of salmon (Davis 2003); and declines in seabird nesting success and survival (Springer and Van Vliet 2014; Springer et al. 2018).

Dominance of oceanic food webs by salmon is not consistent with the abundance and biomass of salmon relative to other components of the North Pacific ecosystem, including competitors and prey fields. In the western North Pacific, Shuntov et al. (2017) estimated the nekton biomass was 81.3 million t (from 50 to 100 million t in different years). Pacific salmon accounted for 1–2% of this biomass in the 1980s. Biomass of salmon subsequently increased to the current levels of 4-5 million t, representing 4-8% of total nektonic biomass during the current period of high abundance. During this period, the biomass of

the two most abundant fish species within their ranges in the North Pacific, walleye pollock (*Theragra chalcogramma*) and Japanese pilchard (*Sardinops melanostictus*), reached 50 million t each.

In the epipelagic layer, Shuntov et al. (2017) estimated that the mean annual food consumption (plankton and small nekton) by the nektonic fauna varied within 210.4–327.3 million t; in the 0–1000 m layer it ranged from 389.0 to 516.0 million t. The amount of food consumed by salmon was 4–8 million t. The proportion of total nekton ration consumed by salmon in the epipelagic layer was 1% - 15%, depending on oceanic area (Figure 6).

This view of low to moderate impact on epipelagic food webs is consistent with mass-balance modeling of North Pacific ecosystems by Pauley et al. (1996). Pacific salmon and steelhead were estimated to make up 4.6% of the epipelagic fish biomass in the Alaska gyre. If squid are including as competitive nekton for zooplankton production, Pacific salmon made up 3.4% of the nektonic biomass. Estimated salmon biomass was < 1% of the estimated zooplankton biomass.

Similarly, the impacts of juvenile salmon feeding during early marine residency on zooplankton has been found to be relatively low. As noted above, the early marine residency is a period of high and variable mortality which may determine year class strength. Given more limited areal habitat than the coastal zone and ocean basin, this period may represent a potential bottleneck for survival. Orsi et al. (2004) used a bioenergetics model to examine consumption of zooplankton by hatchery and wild chum salmon in Icy Strait, Southeast Alaska. They found that juvenile chum salmon consumed only 0.05% of the zooplankton/km² in the upper 20-m of the water column, and 0.005% for the integrated water column to 200 m in June and July in 2001. Because juvenile salmon are typically in the upper water column, total standing crop of zooplankton is not likely to be available as forage on a daily basis, but does represent a source for zooplankton abundance in the surface layer through vertical diel migrations. The percentage of available prey consumed by juvenile salmon in the neritic habitat of Icy Strait was less than 0.05% of the available standing stock. Low consumption estimates were also estimated by several other studies. Karpenko (2002) reported that juvenile chum salmon consumed between 0.1 and 1.1% of the total stock of zooplankton in the upper 10 m of Karaginskii Bay, Kamchatka from June to August over a 5-year period. Cooney (1993) estimated juvenile salmon in PWS consumed 0.8–3.2% of the total herbivore production and 3.0–10.0% of the macrozooplankton production. Boldt and Haldorson (2002) reported that juvenile pink salmon near PWS could consume 15–19% of preferred prey taxa such as large calanoid copepods and amphipods if the available standing crop was fixed over a 10-day period; however, on a daily basis, consumption of no taxon exceeded 2% of the standing stock.

Pink salmon have been identified by some authors as the salmon species most affecting oceanic food webs (Ruggerone and Irvine 2018). Surface layer zooplankton indexes have been associated with differences in abundances of odd- and even-year pink salmon stocks (Batten et al. in press). However, there was no directed fish sampling or monitoring of zooplankton below the surface layer (7.5 m) in Batten et al.'s study. Radchenko et al. (2018) reviews studies showing that “as a rule, no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop.”

A conceptual problem to assigning plankton depletion to pink salmon feeding is prey-switching by salmon species. Pink, chum, and sockeye salmon have substantial overlap in their diets, and the latter two species have been shown to switch to other, “lower-quality” prey when pink salmon are abundant

(e.g., Davis 2003). These changes in feeding habit are often used to support the concept of density-dependent interactions with pink salmon and their congeners, e.g., Ruggerone and Connors (2015). However, if other species switch prey in response to high pink salmon abundance, they certainly would switch back to the “higher value” prey when pinks are not as abundant. Chum and sockeye salmon make up on average 78% of the biomass of these three species. As a result, there is more of a constant prey demand among this feeding guild in spite of the high variability in pink salmon abundance in the North Pacific. Rather than shaping the ocean food web, pink salmon appear to be most sensitive to interannual changes in oceanic conditions, resulting in high variability in their numbers, both temporally and geographically.

Competition among species may also be minimized by the distribution of salmon in oceanic habitats. Unlike the schooling behavior characteristic of juvenile salmon and maturing salmon in nearshore and coastal areas, salmon at sea are widely dispersed (Shuntov 2017). This behavior reduces competitive interactions and makes their feeding, growth, and survival in the ocean more density-independent.

The record numbers and abundance of Pacific salmon can appear to be an imposing load on the North Pacific Ocean ecosystem. Four to five million tons of biomass is not a trivial amount. Of this 40% is hatchery origin, primarily chum salmon. Approximately 5 billion hatchery juveniles are released into the North Pacific annually (Figure 7). However, the North Pacific Ocean is a large marine ecosystem, and the numbers are not overwhelming when put into context of total nekton and forage bases. Not all nektonic prey is available to salmon due to depth distribution; Ayedin (2000) concluded local depletion of prey by salmon can occur as salmon school density increases, even if prey is not depleted over large ocean areas. This is an important point in understanding regional differences in changes in size at return.

The sustained high marine abundances of both natural- and hatchery-origin salmon over the past 25 years indicates that the trophic structure has not been altered in some way that inhibits salmon productivity. We agree with the conclusion of Shuntov et al. (2017): “... the role of salmon in the trophic webs of subarctic waters is rather moderate. Therefore, neither pink nor chum salmon can be considered as the species responsible for the large reorganization in ecosystems and the population fluctuations in other common nekton species.”

V. Competition and density dependence versus density independent responses

An intuitive concern with the high abundance of salmon in the context of ocean carrying capacity is that density-dependent competition for limited prey resources may affect growth and survival of salmon populations. Pink, chum, and sockeye salmon have substantial overlap in their diets (Davis 2003, Brodeur et al. 2007) and the latter two species have been shown to switch to other, “lower-quality” prey when pink salmon are abundant (e.g., Davis 2003). High abundance of pink salmon in the Gulf Alaska has been associated with growth and size at return of chum salmon, sockeye salmon, coho salmon, Chinook salmon, and pink salmon themselves (e.g., Agler et al. 2011; Jeffrey et al. 2017; Ruggerone et al. 2003, 2018; Shaul and Geiger 2017; Wertheimer et al. 2004a). Reduced growth can result in lower size-at-age, shifts in age at maturity for species spending multiple years at sea, and reduced fecundity, which can affect productivity of salmon populations. Ruggerone et al. (2003) ascribed large reductions

in marine survival of Bristol Bay sockeye salmon to the impact of Asian pink salmon on the sockeye salmon growth at sea. The concern for density-dependent competition is not new; Peterman (1984) found evidence of density-dependent interactions between Fraser River and Bristol Bay sockeye salmon. This was at a time when salmon abundance had not expanded to current levels and when hatchery fish made up a low proportion of the abundance and biomass. As salmon abundance and biomass increases, Aydin (2000) concluded that density-dependent interactions could result in negative feedback loops on prey availability in the ocean ecosystem.

Despite the existence of competitive interactions in the marine environment, high abundance and biomass have not resulted in consistent negative trends in salmon size or productivity. Ruggerone et al. (2018) reported that average size has declined for chum salmon and pink salmon since 1925, but not for sockeye salmon (Figure 8). Most of the size decline for pink and chum salmon occurred prior to 1977, which would suggest that pre-1977 regime change conditions were more important than density dependent interactions. Size of pink salmon and sockeye salmon remained stable during the recent period of high abundance, while chum salmon showed some continued decline. Jeffrey et al. (2017) reported similar results for average sizes of British Columbia pink, chum, and sockeye salmon since 1951. Pink salmon declined initially in size, and then have remained relatively stable since the 1990s at a size that is 20-30% less than in the 1950s and 1960s. There was little change over the time series in the average size of sockeye salmon. Regional differences have certainly been observed. For example, Wertheimer et al. (2004) found evidence of size declines in PWS pink salmon in relation to pink salmon abundance in the GOA, while. Shaul and Geiger (2017) reported that pink salmon size has increased in Southeast Alaska in recent years.

Helle et al. (2007) found that body-size of pink, chum, and sockeye salmon from Alaska to Oregon generally declined in after the 1977 regime shift as salmon abundance increased, until 1994. After 1994, body size of these species generally increased, during a period when biomass and abundance was at sustained high levels. They attributed the initial decline to density-dependent competition, and the lack of relationship of abundance to size in the latter period as an outcome of favorable ocean conditions. They concluded that the carrying capacity of the North Pacific Ocean for producing Pacific salmon is not a constant value and varies with changing environmental and biological factors.

In their study on size of British Columbia salmon, Jeffrey et al. (2017) examined the relationship of size trends to estimates of salmon biomass in the North Pacific Ocean. They found that the biomass of North American pink salmon entering the Gulf of Alaska was the most important biomass variable in explaining size variation in BC pink salmon. The direction of the effect was negative, suggesting intraspecific competition was affecting size. For chum salmon, combined biomass of North American pink, sockeye, and chum salmon was the most important biomass variable explaining size variation. The direction of the effect was negative, suggesting some degree of competition among these congeners. Biomass of North American chum salmon was the most important biomass variable explaining size variation in sockeye salmon. Adding Asian chum salmon to this (or combined measures of biomass) did not improve the fit. The direction of the effect was positive, indicating that when chums are abundant, growth conditions for sockeye are positive.

These associations (and lack of associations) between ocean abundance and size at return of Alaska and British Columbia salmon indicate that while competition can affect size and growth, density-

independent ocean conditions drive the variability in abundance and can override the impacts of density-dependent competition. We reiterate the findings of Radchenko et al. (2018) that generally, no significant correlations occur among pink salmon growth rate, stock abundance, or zooplankton standing crop.

Reduced survival and productivity of wild stocks in Alaska have been attributed to competitive interactions with Asian pink salmon (Bristol Bay sockeye salmon; Ruggerone et al. 2003) and hatchery pink salmon (PWS pink salmon; Hilborn and Eggers 2001). Alternate analyses and recent trends have refuted these conclusions. In Bristol Bay sockeye salmon, Ruggerone et al. (2003) estimated reduced survivals of even-year sockeye salmon smolts from Bristol Bay at 23-45% less than odd-year smolts for the 1977 to 1997 smolt years. Even-year smolts enter the ocean when odd-year pink salmon are on average more abundant. They concluded that competitive interactions with Russian pink salmon reduced growth of even-year smolts, and resulted in substantially lower average smolt survival. However, the abundance of Russian pink salmon was highly variable over the time period for both odd and even year lines. When pink salmon abundance was considered in a time series analysis of the survival data, rather than using odd/even year average survival, there was no discernable effect of pink salmon abundance on survival (Wertheimer and Farley 2012). Subsequent to the 1997 smolt year, both Asian pink salmon and Bristol Bay sockeye salmon increased in abundance, and a marine survival index for Bristol Bay sockeye salmon smolts was positively associated with abundance (Farley et al. 2018.) Thus increasing biomass of Asian pink salmon has not constrained the continued high productivity of Bristol Bay sockeye salmon.

In PWS, Hilborn and Eggers (2000) concluded that hatchery production provided no net benefit in terms of pink salmon harvest, but was simply replacing wild production through density-dependent interactions. However, Wertheimer et al. (2004a, 2004b) showed that a density-independent index of marine survival explained much of the variability in wild pink salmon productivity, and that there was a large net benefit from enhancement to the PWS pink salmon harvest, albeit with some reduction in wild stock production attributed to the effects of size at return on fecundity. Amorosa et al. (2017) also showed large net gains from hatchery production, albeit lower than would be expected from the authors own argument for proportionate increases in wild pink salmon production following the 1977 regime shift. They minimize the contribution of hatchery fish in PWS by focusing on changes in the common property fishery, dismissing the annual cost-recovery harvest of an average of eight million pink salmon in their evaluation of benefits. The cost-recovery harvest is important to the fisheries economy of PWS, and an important benefit of the enhancement program (Pinkerton 1994). The recent analysis of productivity of PWS pink salmon for the re-certification of sustainability of PWS pink salmon showed continued sustained production of wild stocks during the hatchery era (Figure 9; Gaudet et al. 2017). The historical record returns of wild pink salmon in 2013 and then again in 2015 are particularly demonstrative that wild stocks in PWS retain their high production capacity after 40 years of hatchery enhancement.

Our discussion thus far has focused primarily on the abundance trends of pink, chum, and sockeye salmon, which combined make up most of the biomass of salmon in the North Pacific Ocean. Besides interactions among these species, there is concern that their high overall abundance is negatively impacting coho and Chinook salmon (Ruggerone et al. 2018).

The commercial harvest of coho salmon averaged 1.5 million fish from 1970-1977, then increased rapidly following the 1977 regime shift, peaking at over 9 million in 1994. From 1995 until 2017 the harvest has ranged from 3 to over 6 million fish annually, averaging 4.5 million, with no apparent trend during this period (Figure 10). Approximately 22% of the commercial harvest during the latter period has been produced from Alaska hatcheries. Recreational harvest has increased in recent years, and averaged 1.2 million fish from 2007-2017 (M. Stopha, ADF&G, personal communication).

Mallick et al. (2008) examined marine survival of 14 stocks of coho salmon in Southeast Alaska. They found evidence of effects on marine survival at local, regional, and basin scales. There was high covariation in survival regionally, and no trend was noted over the recent time period. Abundance of juvenile hatchery releases in the year coho smolts went to sea was identified as affecting marine survival, but the effect could be positive or negative, depending on stock. This result exemplifies the complex competitor/predator interactions that have been posited for coho and pink salmon. Negative impacts of large hatchery releases could indicate competition for prey resources or aggregation of prey (Beamish et al. 2018). Positive influences could be a result of “predator sheltering,” where the abundant hatchery juveniles act as a buffer on predation on the less abundant, larger coho smolts (Holtby et al. 1990; Briscoe 2004; LaCroix 2009). Abundant hatchery fry and juveniles could also provide an important forage base for coho salmon. Coho salmon juveniles are a major predator of juvenile pink salmon in nearshore marine areas (Parker 1971, Hargreaves and LeBrasseur 1985) and as adults when returning to coastal areas as the juvenile pink salmon emigrate towards the ocean (Sturdevant et al. 2012).

Shaul and Geiger (2017) showed a negative trend in marine survival in recent years for Berners River coho salmon which they related to ocean biomass of North American pink salmon. They attribute the negative impact to predation of pink salmon on squids that are the major prey for coho salmon in offshore areas. They propose that pink salmon are keystone predators of squid, exerting top-down control and thus directing the energy flow in the system. In contrast, Aydin (2000) concluded that the squid, with its high biomass and productivity, was controlling energy flow to salmon. Aydin (2000) found that squid abundance, while highly variable, had increased greatly (as did salmon) after the 1977/1978 regime shift. That squid abundance increased commensurate with salmon abundance indicates the species were responding similarly to the increased productivity in the North Pacific (Brodeur and Ware 1992). Aydin (2000) also found differences in odd and even year distributions of squid in the North Pacific, which could contribute to the odd/even differences in coho salmon size observed by Shaul and Geiger (2017).

If pink salmon impacts on squid were driving marine survival for coho salmon, we would also expect decreasing trends in abundance and marine survival for coho salmon over the 1995-2015 time period of high pink salmon abundance. Instead, catch has been stable, and marine survival declines, at least in southeast Alaska, are a recent phenomenon. Commercial harvest data for coho salmon and pink salmon show very strong correlation annually (LaCroix et al. 2009). If density-dependent interactions were primary, we would expect negative correlation. The correlation is actually strongly positive; from 1960 – 2017, it had an r value of 0.82 ($P < 0.001$; Figure 10). Because returning adult coho and pink salmon have roughly the same period of time in the marine environment, this indicates that shared ocean conditions are driving their year-class strength.

Size trends in coho salmon have varied regionally, with very different relationships to ocean salmon biomass. Shaul and Geiger (2017) found that size at harvest of coho salmon in southeast Alaska increased from 1970 until 1984, then declined from 1985 to 2015. They associated the decline with an index of the biomass of North American pink salmon. Their model did not indicate direct competition, but rather lagged effects at 2- and 4- years affecting the population dynamics of the squid (*Berryteuthis anonychus*). The lag response model requires that the squid have an obligate two-year life-history cycle as proposed by Jorgensen (2011). This is contradicted by other literature, which characterizes *B. anonychus* as an annual species with high productivity (Katugin et al. 2005, Drobney et al. 2008). Aydin (2000) cites studies showing that *B. anonychus* is highly productive, and spawns twice a year.

Regardless of mechanism, coho salmon size has declined in Southeast Alaska. In contrast, coho salmon body size has increased in British Columbia in recent years. Jeffrey et al. (2017) showed coho body weight declined from the 1950s, and did not reach its minimum until around 1985. Since then it has increased and is now at the highest level in the data series. The combined biomass of North American pink, sockeye, and chum salmon was the most important biomass variable explaining size variation in coho salmon, and had a positive effect on size. The authors speculate that the positive relationship may be driven by environmental conditions, which when favorable allow for greater total biomass of salmon species and higher growth (thus larger size) in coho salmon. Shaul and Geiger (2017) and Jeffrey et al. (2017) both use basin-scale measures of environmental conditions in their models exploring factors affecting coho salmon size. The contrasting results for Southeast Alaska and British Columbia are indicative of the variability in response of different populations to these conditions. This may be caused by different migration patterns in the ocean environment, or different local and regional responses of availability of salmon forage to basin-scale environmental factors.

The recent disastrous returns of Chinook salmon in Alaska has precipitated considerable focus on the least abundant but (on a fish by fish basis) most highly valued salmon species (ADF&G 2013). Chinook salmon have a highly varied and diverse life history, generally more complex than other Pacific salmon exemplified by numerous variations in run and spawn timing, freshwater biology, ocean distribution and behavior patterns, diet, slower ocean growth, and older age at maturity (Healey 1991). In the eastern North Pacific most juvenile Chinook salmon from Oregon to Southeast Alaska remained within 100-200km of their natal rivers until their second year at sea, regardless of their freshwater history (sub-yearling or yearling) and spring, summer, or fall adult run timing (Trudel et al. 2009). Healey (1983) reported that most fall type Chinook salmon tend to remain continental shelf and slope oriented during much of their ocean life history whereas many spring type fish spend much of their ocean life in more offshore waters. In recent years, based on coded-wire tag recoveries, it was found that many Alaska spring-type Chinook salmon also utilize slope and continental shelf waters as immature adults. Coded - wire tagged Chinook salmon from Southeast Alaska (SEAK) and Cook Inlet frequently are recovered in Bering Sea Aleutian Island and Gulf of Alaska trawl fisheries for Walleye Pollock (Meyers et al. 2001; Celewycz et al. 2006).

Marine habitats of Chinook salmon related to depth distribution and migration patterns are diverse and often distinct from most other Pacific salmon. Juvenile Chinook salmon distribute deeper than coho and other juvenile salmon in their first summer and fall at sea (Orsi and Wertheimer 1995; Beamish 2011). Immature Chinook salmon are associated with colder temperatures and deeper depths than other salmon species (Walker et al. 2007; Walker and Myers 2009; Riddell et al. 2018). Diel vertical migrations have

been documented in a number of data storage telemetry studies, with movement to greater depths during daylight hours (Radchenko and Glebov 1998; Murphy and Heard 2001; Walker et al. 2007). One Chinook salmon tagged in the Bering sea typically was between the surface and 100 m depth, but occasionally moved to depths in excess of 350 m (Walker and Meyers 2009).

Marine diets of Chinook salmon are distinctly different than diets of pink, chum, and sockeye salmon and more similar to coho salmon (Brodeur et al. 2007; Riddell et al. 2018). Juvenile (first-ocean year) Chinook salmon in coastal waters initially have highly varied diets composed of fish, zooplankton, and insects, then become predominately piscivorous in costal habitats (Brodeur et al. 2007). Fish made up from 65% to 99% of stomach contents by weight for juvenile (ocean- age 0) Chinook salmon sampled within the inside and outer coastal waters of SEAK (Landingham et al. 1998; Weitkamp and Sturdevant 2008). Fish were also the primary prey for immature (mostly ocean-age 1) fish in SEAK (Cook and Sturdevant 2013), coastal British Columbia (Herz et al. 2017), and northern and southern Bering Sea (Farley et al. 2009). Primary prey species included capelin, sand lance, lanternfish, and Pacific herring. In more offshore habitats, Chinook salmon consume primarily fish and squid, although euphasids can make up a substantial portion of their diet (Davis 2003; Shuntov et al. 2010; Karpenko et al. 2013). Herring and sandlance dominate the diets of older immature and maturing Chinook salmon (ocean-ages 2+) in coastal waters (Reid 1961; ATA 2016), with sandlance the dominant prey in outside waters of southeast Alaska and herring the dominate prey in inside waters (ATA 2016).

Run sizes increased across AK after the 1977 regime shift, and were variable but consistently above average until a precipitous decline starting in 2006 (Figure 11). This decline was consistent with reduced marine survival of southeast Alaska stocks after the 2000 and 2001 brood years (ADF&G 2013; Ohlberger et al. 2016; CTC 2018). Thus the decline began well after the current period of high biomass of salmon in the ocean started (Figure 1), and well after hatchery releases into the North Pacific peaked and stabilized at 5 billion per year in 1988 (Figure 7).

Size at maturity and age at maturation has declined over the last three decades for Alaska Chinook salmon stocks from southern Southeast Alaska to the Yukon River (Lewis et al. 2017). The size declines are coincident with high abundances and biomass of the Big Three (pink, chum, and sockeye salmon). Could competitive interactions with the Big Three be driving the decline? There are several lines of evidence that indicate this is not the case.

First, the differences in marine ecology we noted in the preceding paragraphs suggest that Chinook salmon, by their propensity to utilize deeper depth strata and distribute more broadly on shelf and slope areas during marine residency, are segregated to a large degree from other salmon in their use of ocean habitats with correspondingly different temperatures, prey fields, and predator complexes. These differences are exemplified by the growth differences of Chinook salmon and coho salmon in their first winter at sea. Although approximately the same size in the fall, by the following year coho salmon of the same ocean cohort are over three times larger than Chinook salmon (Riddell et al. 2018).

Second, while Lewis et al. (2017) found predominately declining size for older (ocean age 3 and 4) Chinook salmon, size of ocean age 2 fish has generally not changed over the time period (Figure 12). If competition was driving the size decline, competition should be most intense for the younger age Chinook salmon, which have a more extensive overlap in size and type of prey with other salmon. Also, lower ocean growth in Pacific salmon is typically associated with shifts in age distribution towards older

ages (Hard et al. 2008), but instead average age at maturity has declined. Thus there has not been an apparent decline in growth of 1-ocean and 2-ocean age Chinook salmon during the “high abundance” period.

Third, British Columbia Chinook salmon have been increasing in average size over this time period (Jeffrey et al. 2017). These authors found a positive relationship between biomass of North American salmon and British Columbia Chinook salmon average size, indicating that size was a function of the same favorable ocean conditions sustaining the record overall biomass.

Size declines of Chinook salmon are not new in Alaska waters; Ricker (1981) found a significant decrease in size of Chinook salmon harvested in the SEAK troll fisheries from 1960 to 1974, and identified selective fishing for older, larger fish as a factor in the decline. Research by Hard et al. (2009) and others indicate selective harvesting of large older age groups of Chinook salmon can introduce reductions in fitness and cause genetic drift in growth, size, and age of maturity due to the heritability of these characteristics. However, fishing alone does not explain the decline across the geographic range of Alaska Chinook salmon, because the degree to which populations are exposed to directed selective fishing varies considerably across the range. It also does not explain the sudden decline in marine survival, as fishing pressure and exploitation rates in the ocean have not increased (CTC 2018b).

Another large predator besides humans also target larger, older Chinook salmon. Resident killer whales have been found to preferentially feed on larger Chinook salmon (Olesiuk et al. 1990; Hanson et al. 2010). In northern British Columbia and southern Alaska waters killer whales have increased at annual rates of 2.9% and 3.5%, respectively (Hilborn et al. 2012; Matkin et al. 2014), more than doubling their abundance since the 1970s. Intense predation on larger fish, coupled with lower marine survival, could contribute to the changes at size at age and age at maturity of Alaska Chinook salmon.

There is substantial evidence that much of the variation in Chinook salmon marine survival is due to conditions in the first summer and winter at sea (e.g., Greene et al. 2005; Duffy and Beuchamp 2011; Sharma et al. 2013; Murphy et al. 2017). Local conditions encountered by juvenile Chinook salmon during early marine residency thus play an important role in determining year-class strength. However, the concordant trends in survival across such a broad geographic range indicate that large-scale processes are affecting stocks across regions. Increasing populations of pinnipeds could also be affecting early marine survival. Chasco et al. (2017) estimated predation on juvenile Chinook salmon by pinnipeds in Puget Sound had increased an order of magnitude from 1970 to 2015, and was now, expressed as adult equivalences, more than six times greater than the combined commercial and recreational catches in Puget Sound.

For Pacific salmon species that spend multiple years at sea, annual marine survival generally increases with size and age (Ricker 1976). For cohort reconstruction of Pacific northwest and SEAK Chinook salmon, natural mortality is assumed not to vary interannually and to decrease with ocean age, from 40% for ocean-age 1, 30% for ocean-age 2, 20% for ocean-age 3, and 10% for ocean-age 5 or older (Sharma et al. 2013; CTC 2018b). These assumptions are simplistic and undoubtedly not always correct, but there is little information to better inform the assumptions. Changes in the North Pacific ecosystem, such as increased killer whale populations, could introduce more mortality at older ages, and further depress realized survival during periods of poorer environmental conditions for Chinook salmon.

VI. Conclusions

In spite of concerns over exceeding the carrying capacity of the ocean, Alaska salmon have been at unprecedented levels of abundance over the past 25 years. Conditions influencing survival in the ocean, rather than density-dependent interactions, seem to be driving both the high abundance at the basin-scale and the high variability in salmon populations at local and regional scales. The Alaska salmon harvest over the past 25 years has been characterized by sustained high production from wild stocks and large contributions of hatchery fish. Enhancement has made large net contributions to supplement wild stock harvest in some areas of the state. Density-dependent interactions have been observed at different life history stages of salmon and in nearshore and oceanic habitats during this period, but have not constrained the recovery of Alaska salmon from its nadir in the 1970's, or its sustained high abundance. Rather, density independent responses to climatic factors affecting ocean conditions appear to have largely driven the high and variable productivity of Alaska salmon.

Recent climatic and oceanographic events such as the marine heat waves of 2004/2005 and 2014/2015 in the Gulf of Alaska are demonstrative of the intrinsic variability of ocean conditions affecting salmon at local and regional scales. Will density-dependent interactions become increasingly important if and when ocean conditions become less favorable to salmon? Would then large releases of hatchery fish put wild stocks in more jeopardy? Or will hatchery fish provide a buffer to sustain fisheries when wild stock productivity is low in response to varying environmental conditions? The enhancement program in PWS offers empirical support for the latter concept. Even during the recent period of generally high productivity, wild pink salmon production in PWS has fluctuated dramatically (Figure 9). In 2009, wild stock harvests were below one million fish, while over 17 million hatchery fish were harvested. By focusing harvest on hatchery fish, managers met escapement goals (Gaudet et al. 2017). Subsequently, both hatchery and wild pink salmon set new historical highs for harvest and production in 2013 and 2015. Large releases and returns of hatchery pink salmon in years of both low and high wild stock abundance did not limit the production potential of the wild stocks.

Authors

Alex Wertheimer retired after 35 years working for the National Marine Fisheries Service Fisheries as a Fisheries Research Biologist in Alaska. He has carried out research and published extensively on salmon in Alaska on issues including salmon enhancement technology and strategies, hatchery and wild salmon interactions, bycatch mortality of Pacific salmon, the impact of the Exxon Valdez oil spill on salmon in Prince William Sound, and the nearshore and pelagic marine ecology of Pacific salmon. He was a member of the science team that wrote the Alaska Genetic Policy, the National Oceanic and Atmospheric Administration (NOAA) Biological Review Team assessing status of Chinook salmon in the Pacific northwest, and the Chinook Technical Committee of the Pacific Salmon Commission. He was awarded the Wally Nuremberg Award for Fisheries Excellence by the American Fisheries Society Alaska Chapter. Upon retirement in 2009 after 35 years of Federal service, he received the NOAA Distinguished Career Award. Since retirement, he has continued to consult on scientific studies and reviews, including forecasting of Pacific salmon, quantification of by-catch mortality, and the Pacific Salmon Recovery Plan. He currently serves on the Pacific Salmon Commission's Standing Committee on Scientific Cooperation and on the Science Panel overseeing the Alaska Hatchery Research Program. He is the President of the Board of Directors of the Southeast Alaska Land Trust, and is a member of the Board of Directors for DIPAC, Inc., a major non-association private non-profit hatchery based in Juneau. He was supported in his work on this paper by the Northern Southeast Alaska Aquaculture Association.

William (Bill) Heard retired in 2012 after 52 years of Federal Service as Fishery Research Biologist. Much of his career was with NOAA Fisheries Alaska Fisheries Science Center's Auke Bay Laboratories, but he also worked for the U.S Fish and Wildlife Service Bureau of Commercial Fisheries and Bureau of Sport Fisheries and Wildlife. He did extensive research and published frequently on Alaska salmon and other fishes. Bill authored or co-authored peer reviewed publications on all five species of North American Pacific salmon. For over 35 years he supervised research at Little Port Marine Research Station focused on enhancement technology and ecology of pink, coho and Chinook salmon. He actively participated on many technical committees and focused groups involved with Alaska, National, and International salmon issues, including Governor Jay Hammond's Fisheries Council concerned with policies and development of salmon hatcheries in Alaska, North Pacific Fishery Management Council Plan Development Team for Fishery Management Plan (FMP) on salmon fisheries, Pacific Salmon Commission (PSC) Northern Boundary Technical Committee, North Pacific Anadromous Fish Commissions (NPAFC) Committee on Scientific Research and Statistics (CSRS) and U.S.-Japan Natural Resources (UJNR) Aquaculture Panel involved with salmon hatcheries in Japan. Participating in NPAFC, PSC, and UJNR afforded opportunity for travel to most North Pacific rim countries with populations of salmon including Russia and Republic of Korea . Bill received fre awards for research excellence in fisheries from ADF&G, Alaska Chapter American Fisheries Society, U.S. Department of Commerce Bronze Medal Award, NOAA Fisheries Employee of the Year and NOAA Fisheries Distinguished Career Award. He was an Affiliate Associate Professor, University of Alaska Fairbanks, School of Fisheries and Ocean Sciences.

Figures

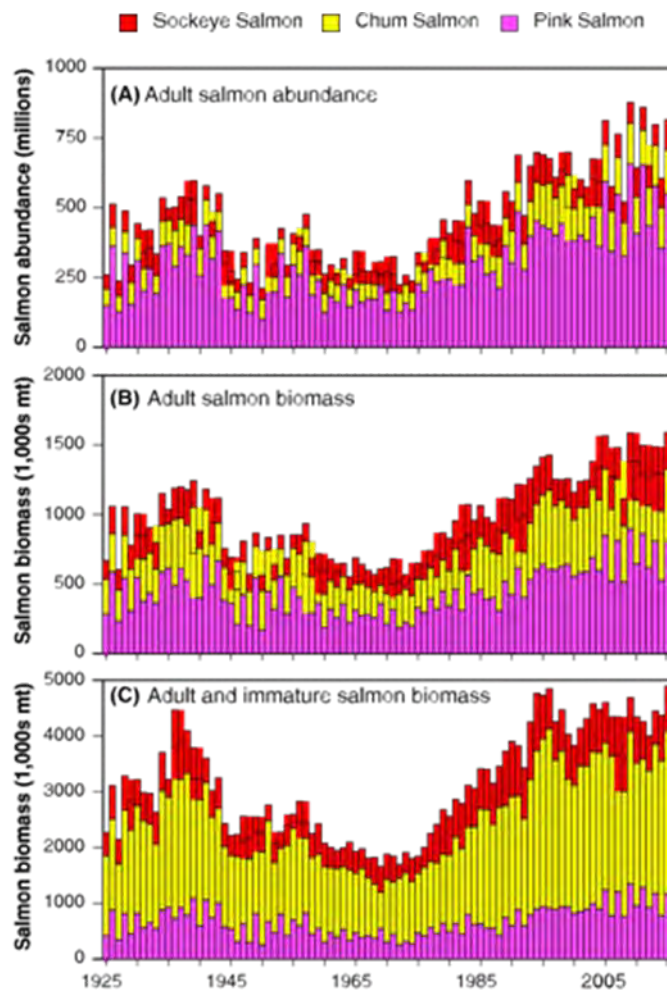


Figure 1. (A) Abundance (millions of fish), (B) adult biomass (thousands of metric tons), and (C) adult and immature biomass (thousands of metric tons) of Sockeye Salmon, Chum Salmon, and Pink Salmon in the North Pacific Ocean, 1925–2015. From Ruggerone and Irvine (2018).

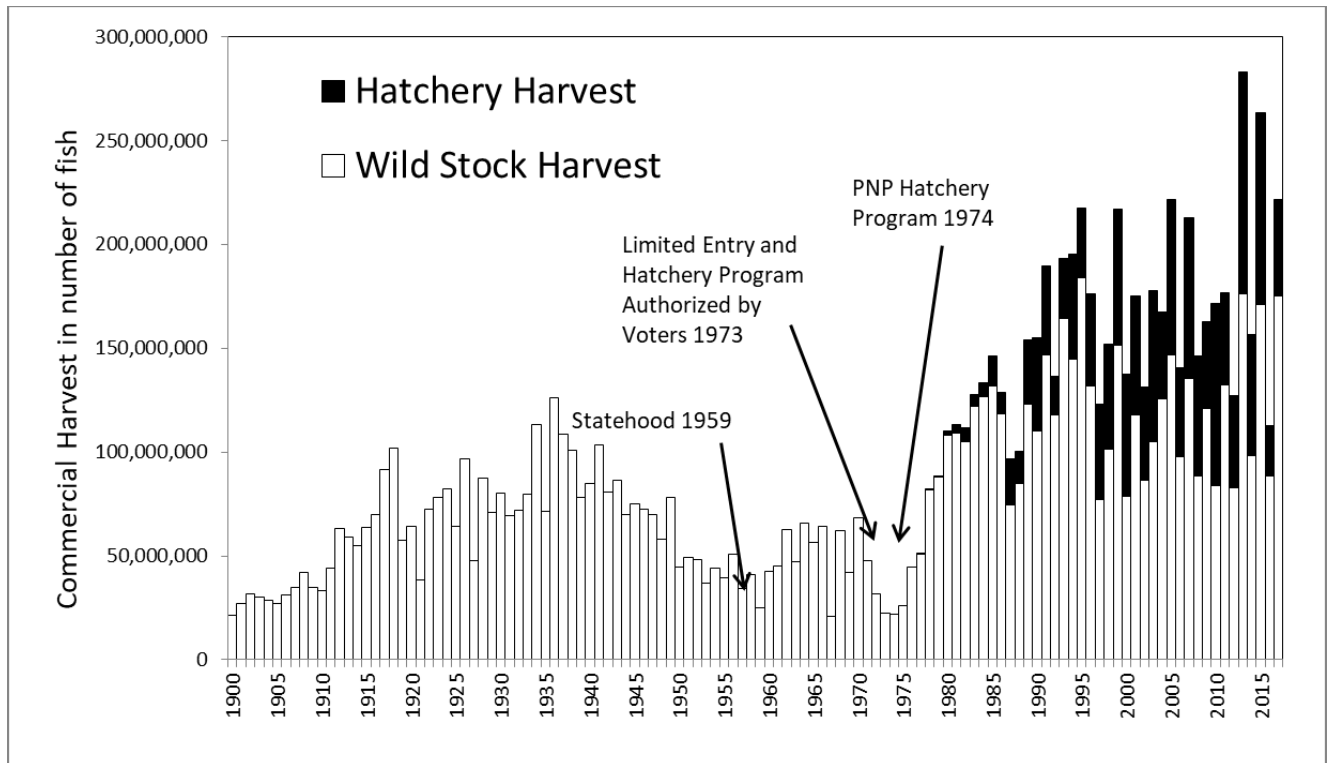


Figure 2. Commercial salmon harvest in Alaska, 1900-2017. From Stopha (2018).

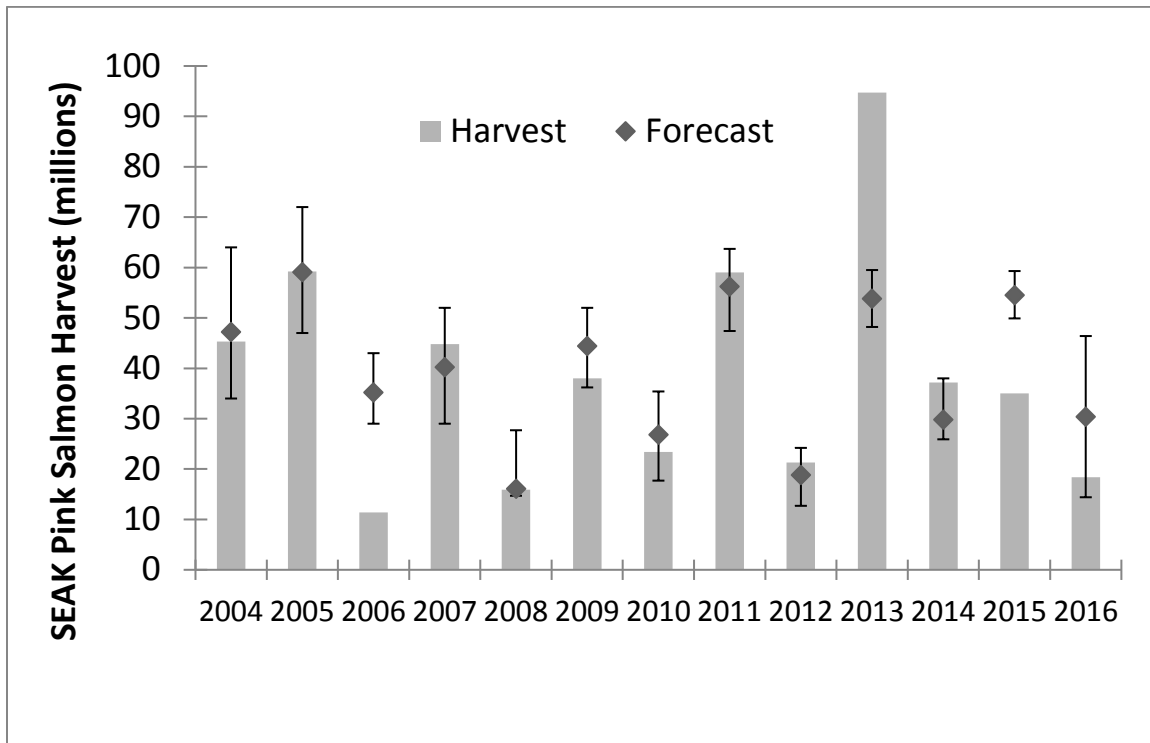


Figure 3.—Southeast Coastal Monitoring (SECM) project pink salmon harvest forecasts for Southeast Alaska (SEAK; symbols), associated 80% confidence intervals (lines), and actual SEAK pink salmon harvests (grey bars), 2004-2016.

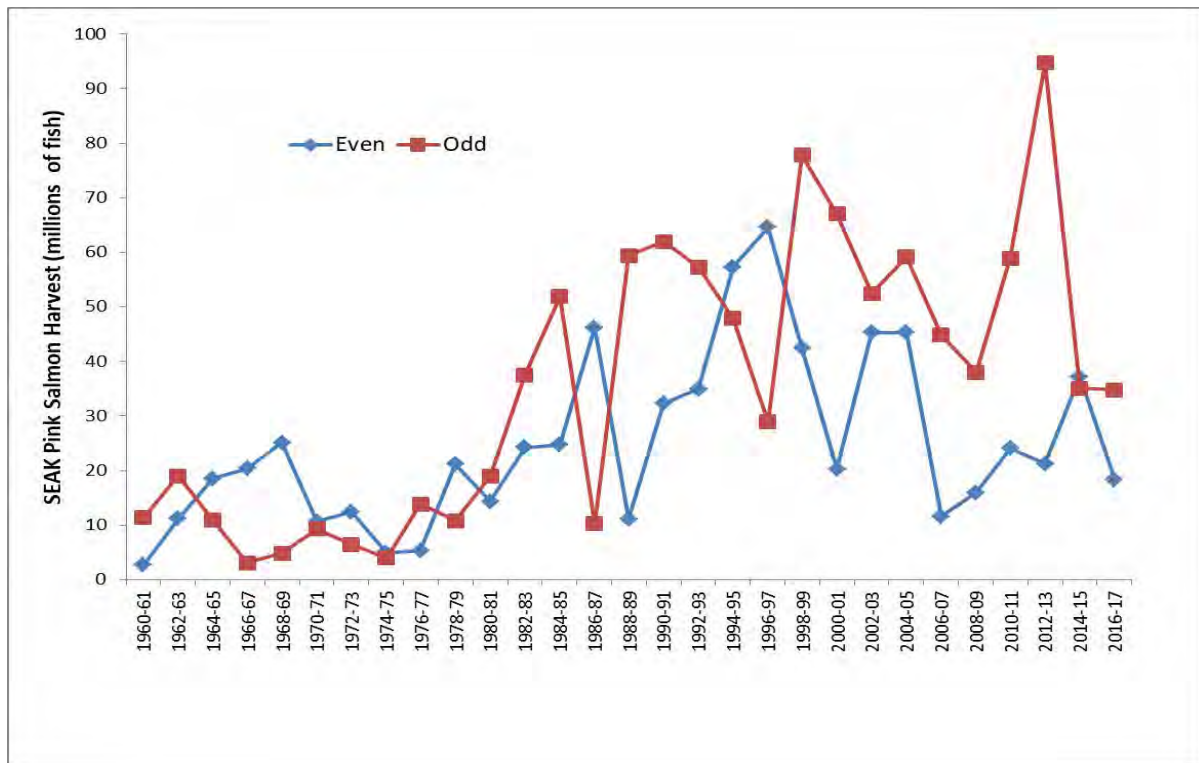


Figure 4. Even- and odd-year harvests of Southeast Alaska pink salmon, 1960-2017. Data are from Alaska Department of Fish and Game catch statistics.

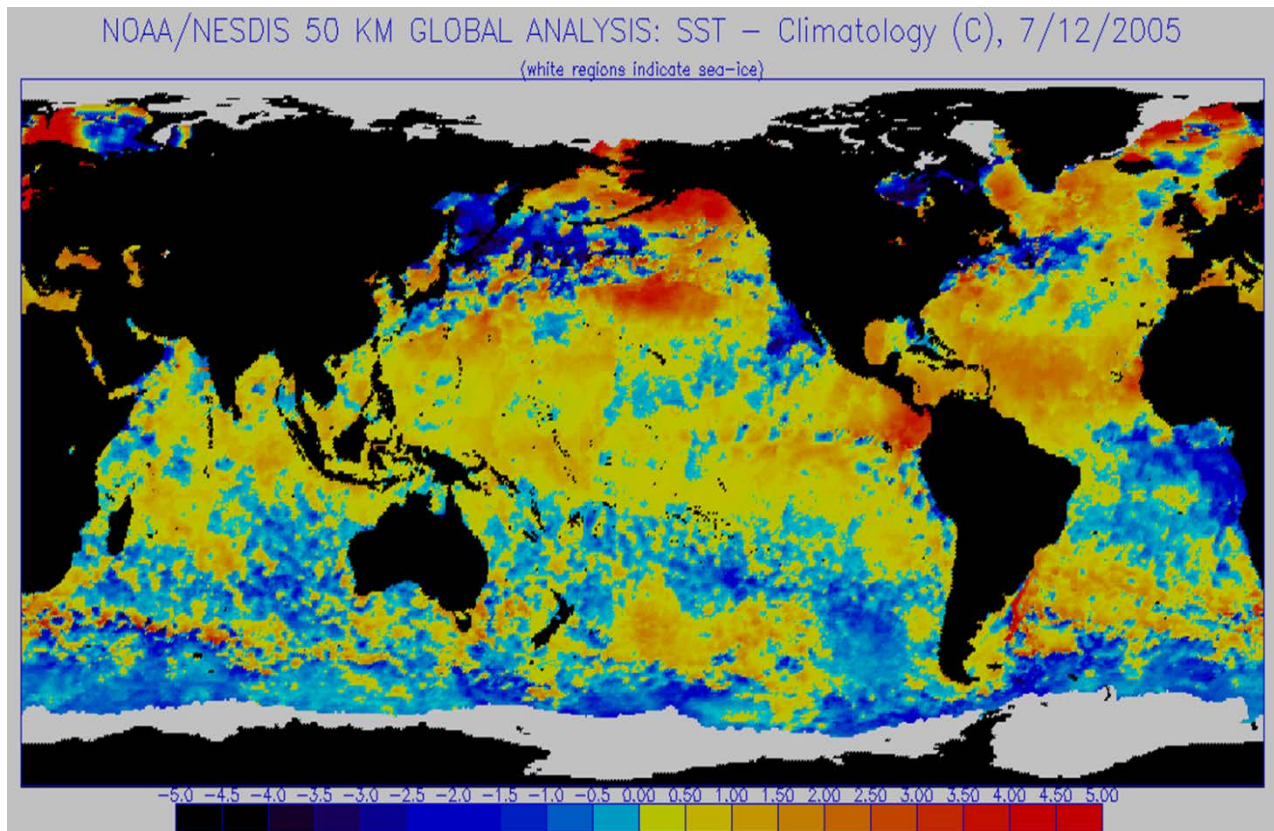


Figure 5. Sea surface temperature anomalies, July 12, 2005. NOAA Satellite and Information Service, National Environmental Satellite, Data, and Information Service (NESDIS)
<http://www.osdpd.noaa.gov/PSB/EPS/EPS.html>

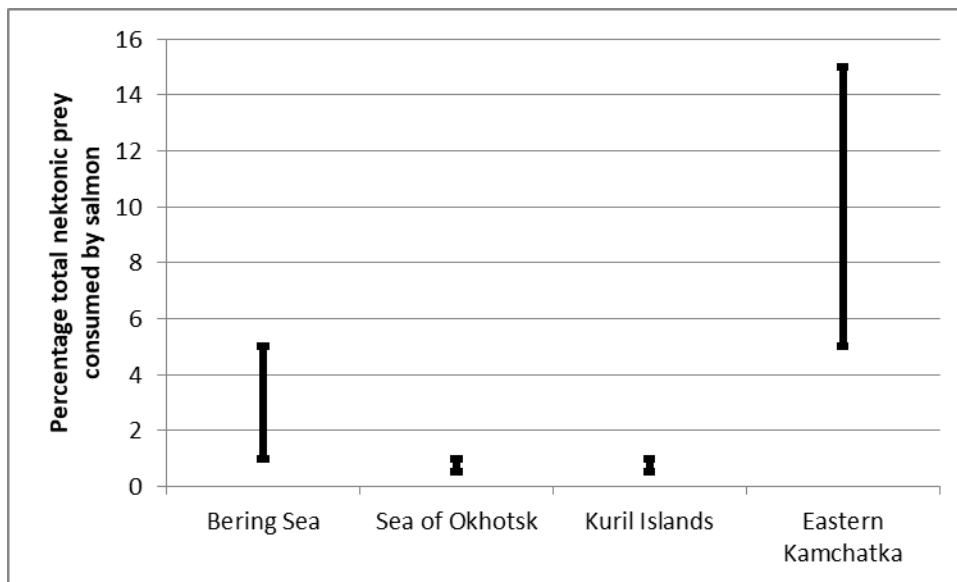


Figure 6. Percentage total nektonic prey consumed by salmon in the western North Pacific Ocean. Estimates are from Shuntov et al. (2017).

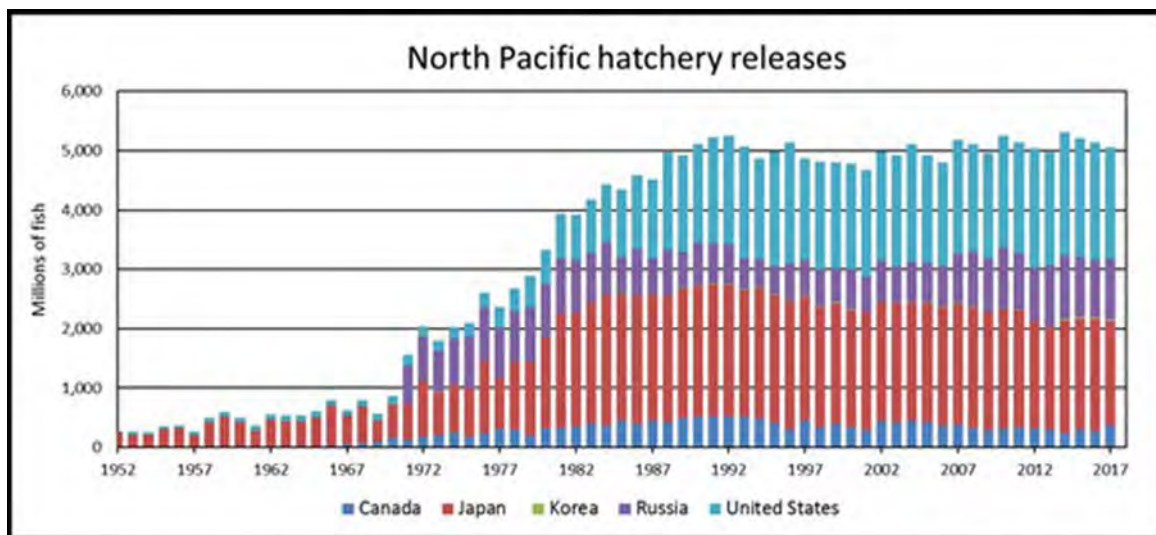


Figure 7. Hatchery releases of salmon into the North Pacific Ocean, 1952-2017. Source: North Pacific Anadromous Fish Commission.

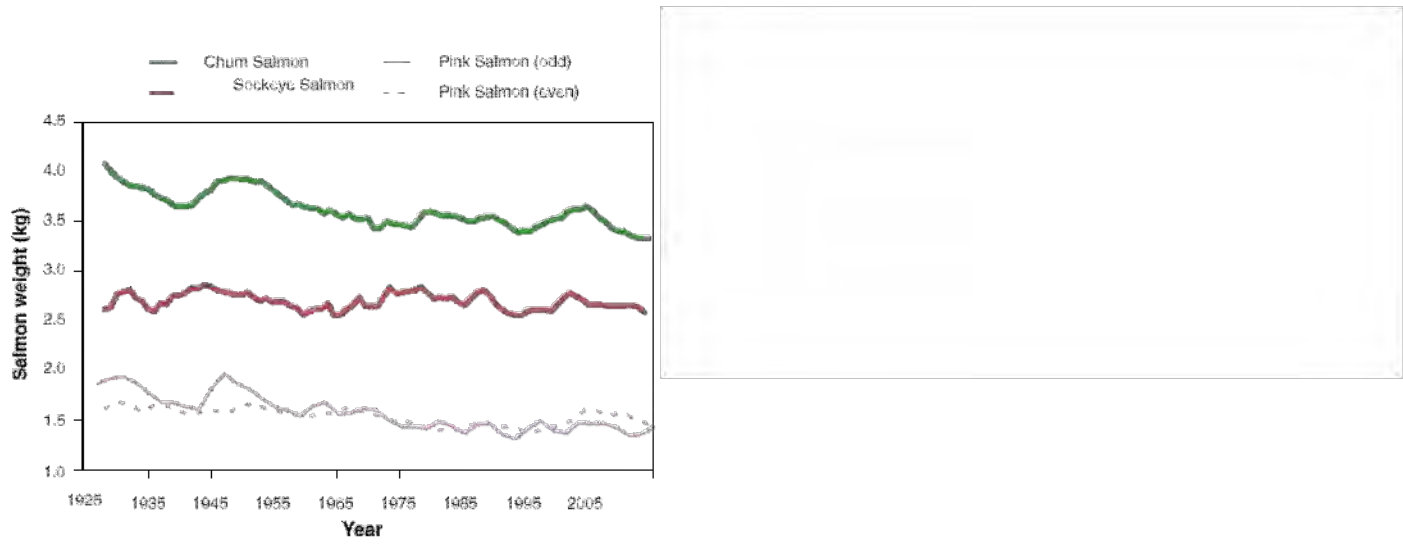


Figure 8. Average weight of pink salmon, chum salmon, and sockeye salmon captured in commercial fisheries, 1925-2015. From Ruggerone and Irvine (2018).

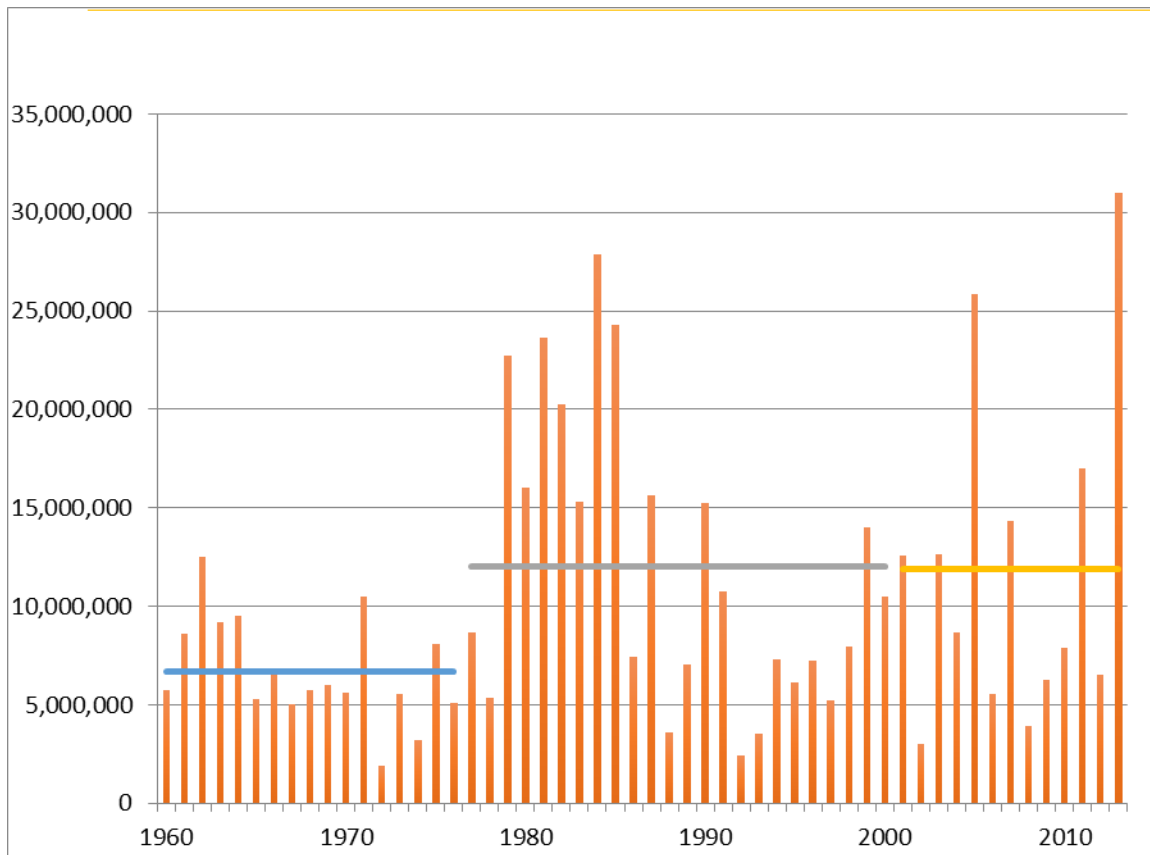


Figure 9. PWS Wild Pink Salmon Production for 1960-2013. Lines indicate average production for pre-hatchery years (1960–1976) and two hatchery time periods: 1977–2000 and 2001–2013. From Gaudet et al. (2017).

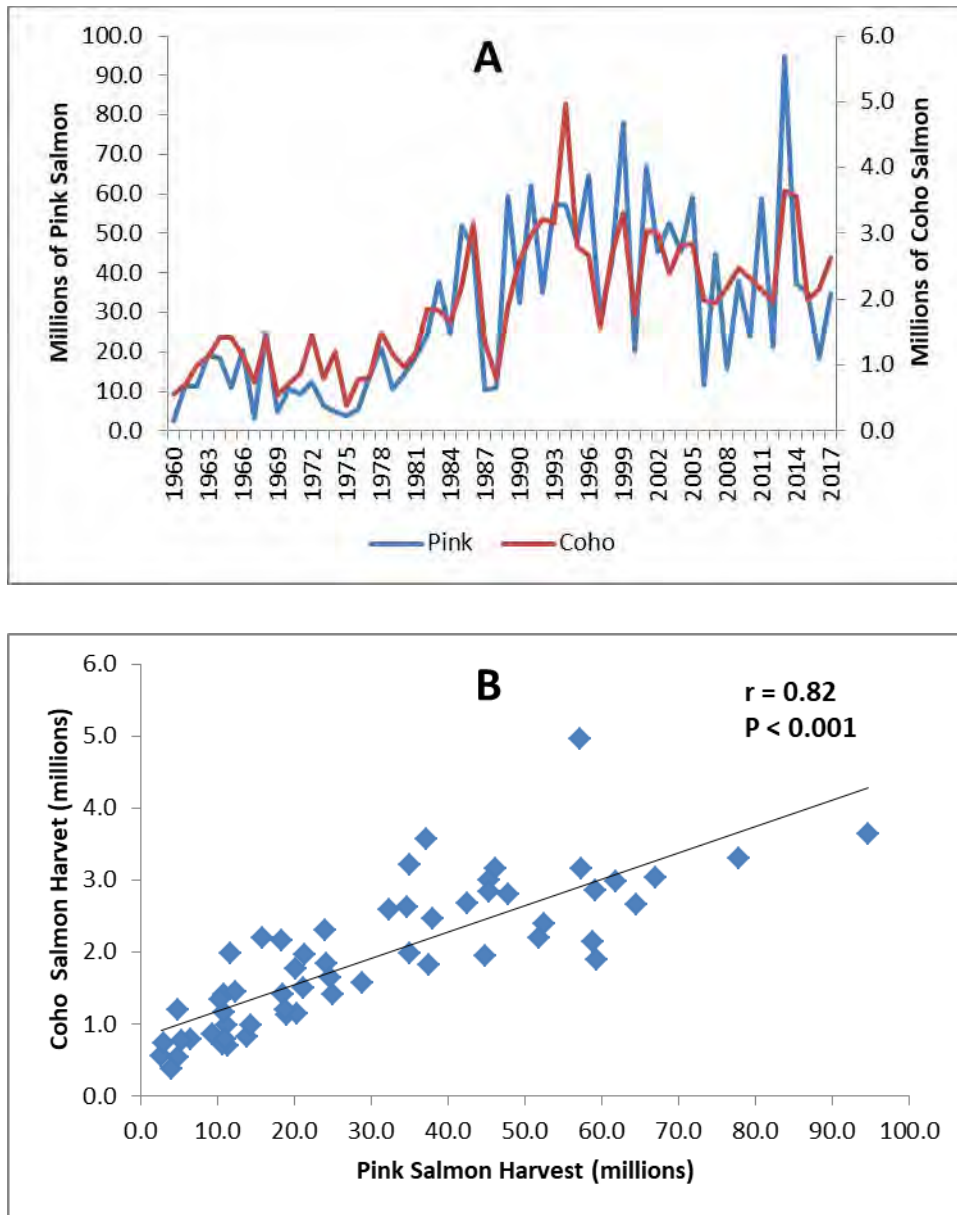


Figure 10. Commercial harvest of Southeast Alaska pink and coho salmon, 1960-2017 (A), and their correlation (B). Data are from Alaska Department of Fish and Game catch statistics.

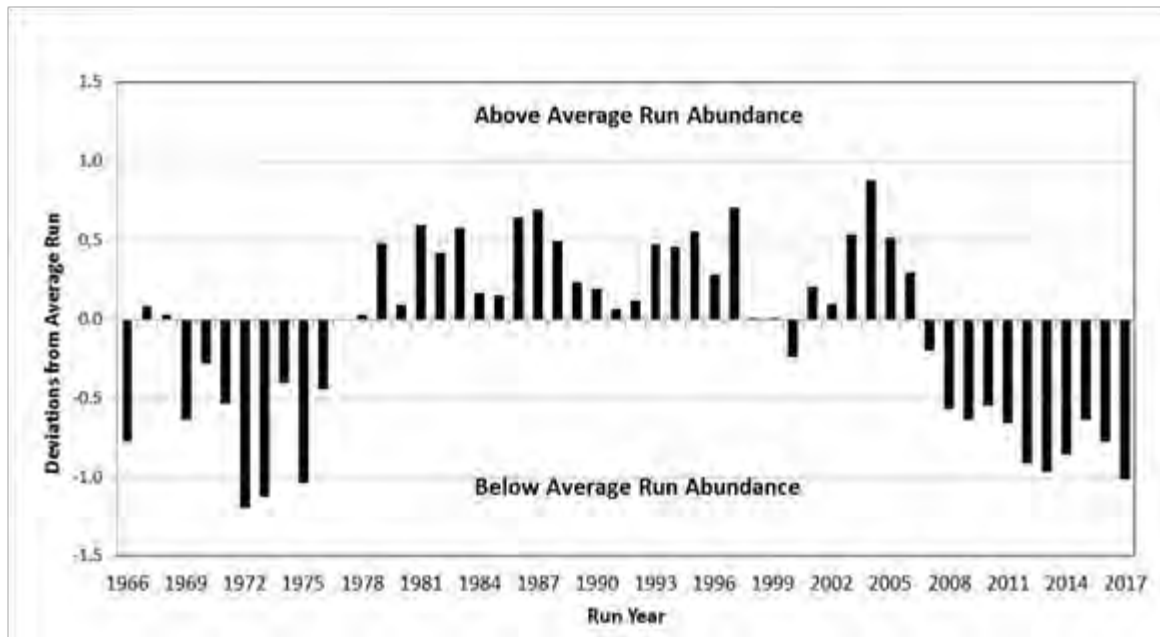


Figure 11—Average of standardized deviations from average run abundance for 21 stocks of Chinook salmon in Alaska (the Unalakleet, Nushagak, Goodnews and Kuskokwim in western Alaska; the Chena and Salcha on the Yukon River; the Canadian Yukon, the Chignik and Nelson on the Alaska Peninsula; the Karluk and Ayakulik on Kodiak Island; the Deshka, Anchor and late run Kenai in Cook Inlet, the Copper in the northeastern Gulf of Alaska, and the Situk, Alsek, Chilkat, Taku, Stikine, and Unuk in Southeastern Alaska). From CTC (2018a).

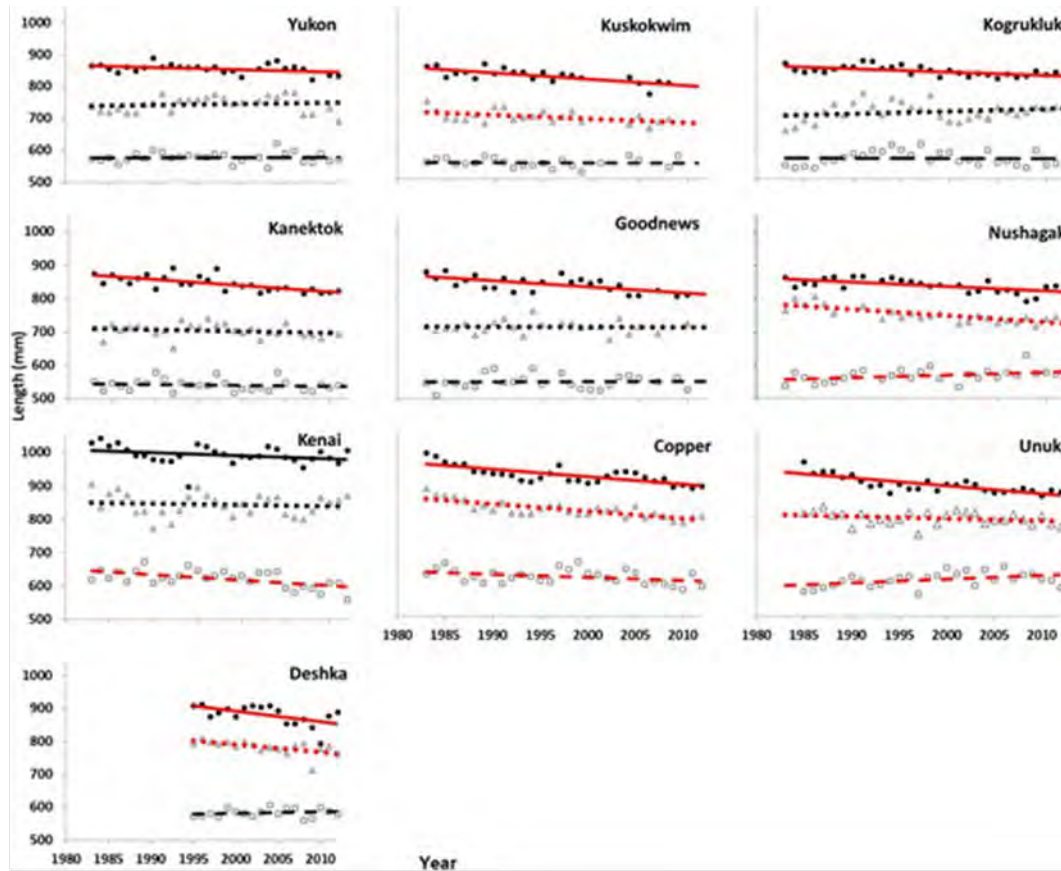


Fig 12. Linear regression of mean annual length (mm) Chinook salmon by stock, age class, and year. Closed circles and solid line = 4-ocean; triangles and dotted line = 3-ocean, open square and dashed line = 2-ocean. Red lines indicate slopes significantly different from zero ($P < 0.05$). From Lewis et al. (2017).

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Submitted by: Ben Allen

Community of Residence: Willow

Comment:

support 51,52,53,63 We need to get more kings up river to spawn to maintain the ecology of the ecosystem and to provide opportunity for future generations. Ideally I'd like to see the commercial fishery completely closed until in river indices strongly suggest escapement goals will be met. Kings are on the brink of being listed as endangered and need protection from the most impactful user group. Last year ADF&G 's preseason Copper Basin king salmon projection was grossly overestimated which allowed for an unrestricted commercial fishery and completely closed sports fishery. The commercial fishery harvested close to half of the minimum escapement. Area managers were so concerned with in river King salmon abundance they could not even offer a catch and release opportunity to the very FEW anglers who were willing to participate. In 2020 and 2024 ADF&G could not provide a predictable king salmon sport fishery and no opportunity. oppose 55, 72 my whole season was taken away in 20&2024

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

I am writing to you today on behalf of our family's 4 Kodiak-based trawl vessels, F/V Nichole, F/V Mar Del Norte, F/V Chellissa, and F/V Dawn, all of which are owned by my father, Joseph Ham. We are a true family business; my father, (Joseph D. Ham), continues to oversee our vessels, after being fishing himself for 30+ years. I manage bookkeeping and day-to-day operations for the boats. My sisters are also involved and two of my brother-in-laws are Captains on our boats, and all our Captains and crew are Kodiak residents. This is our home, we are raising our families here, and we are a part of the Kodiak community.

We strongly oppose Proposals 14, 15, 16, and 17 regarding the Prince William Sound pollock fishery because these proposals offer zero benefits and only hurt Alaskan families and businesses like us, which in turn harms Kodiak.

Prince William Sound pollock gives our vessels and crews their first paycheck of the year; we all fish there after the January 20th opener because the Sound has big, clean pollock that are easy to catch. Even though it's a longer journey from Kodiak, it allows us to bring fish to town to keep our plants operating while we wait for the CGOA pollock to school up in the Shelikof. Not only do we harvest pollock in the Sound, but our boats also spend the entire summer in the Sound, salmon tendering. It keeps us busy in the summer, but it allows us to support the salmon fleet which makes their fishery more efficient. If we stop catching pollock in the Sound, they will eat the young salmon, which will result in another disaster. This summer's salmon returns were already scary enough.

We have been fishing in PWS and tendering salmon there for about 10 years. We care about the health of PWS and maintaining sustainable fisheries. Our children, who are old enough, come tendering with us all summer (and started at 4 years old); we are training the next generation of fishermen to keep feeding Alaska and the world. Right now, the fishing industry is dealing with extreme hardship from skyrocketing costs and rock bottom ex-vessel prices. We need every opportunity, including PWS pollock and healthy pink fisheries for PWS salmon tendering, to remain in business. Taking anything away is another nail in the coffin for Alaskan family businesses like us.

We urge you to oppose Proposals 14, 15, 16, and 17.

Thank you for the opportunity to comment.

Sincerely,

Kori L. Allen

Submitted by: Marcus Allen

Community of Residence: Texas

Comment:

Copper River AF&G salmon management for 2024 of allowances for each consumer group and resulting insufficient fish return to spawn is evidence that management must be drastically changed to preserve the Copper River salmon fishery, especially King salmon. Sports fishing is not sustainable due to unpredictability: If, when, how long and what restrictions will be applied. Sport fishing consumer group is likely to be eliminated in the Copper River drainage; king salmon upstream of nets & wheels. Although I support Proposals like 51, 52 & 53, the high allowances for downstream consumers along with recent years' significantly lower returns creates an unequitable access to the King salmon. Increased salmon takes by Chinese and Russian trawlers, king salmon in commercial trawlers by-catch and food shortages for wild salmon from fish farming and legal non indigenous salmon is rapidly reducing returns. Downstream consumer allocations must be significantly reduced for next 3-5 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 fishing PWS gillnet for 14 years. I've been commercial fishing for 34 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,

spencer allen

A solid black rectangular box used to redact the signature of Spencer Allen.

Homer

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 47 - SUPPORT

-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

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.

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:

Dear Alaska Board of Fisheries members and representatives,

On behalf of the majority of all citizens of Alaska collectively, as well as the citizens who reside, occupy, and work, and recreate in the Pacific Northwest including the West Coast of America as well as Canada, we are overwhelmingly in support of Proposals 14, 15, 16, and 17 that seek the Board of fisheries action to update regulations for the pelagic trawl pollock fishery in the Prince William Sound Management Area under 5 ACC 28.263.

ADF&G manages the only pelagic trawl fisheries within state waters which as you know is within 3 miles of Alaska's coastlines. Alaska's residents rely on both the anadromous species as well as the non-anadromous. Trawling, no matter the size and type, is the most destructive fishery happening in American waters and ADF&G enables the destruction by not banning trawling within their jurisdictional authority and the 3 miles within the coastline of Prince William sound, amongst all others. The data, as inaccurate and under reported as we as citizens receive, shows that trawling has all but decimated opportunity statewide for the citizens of Alaska to capitalize on both for local economic sustainability as well as the subsistence opportunity with has fed local Alaskans for literally hundreds and hundreds and hundreds of years.

It really isn't a fair management system and whomever has continued this destructive process over the last 30 years, both private individuals who lobby for the trawl fleet as well as the public appointees who have continued to allocate and cater to the trawl fleet should be tried in a court of law for treason, bribery, and the economic and nutritional losses that the citizens of Alaska have succumbed to over the past 40 years. Alaskan's and seafood go hand in hand and that's how it's always been. You, the ADF&G Board of Fisheries, over time, and time and time again, are the responsible ones who regulate us Alaskans. You have been bribed by big cooperate fast food industries and foreign owned seafood cooperations to rape and pillage anything and everything that can be made into a fish stick or fish sandwich or sell overseas from the top of the water column all the way to the bottom and everything in between at the severe cost to the citizens of this state.

As a collective Board in charge of managing and allocating by regulation, you have failed us all, (and even yourselves whether you believe that or not) significantly. Orcas and other species of whales, all species of sharks, seals, walruses, all species of crabs, squid, shrimp, halibut, all species of rockfish, all species of anadromous salmon, amongst all other aquatic species have been severely affected by allowing the trawl fleet free reign to do as they please, mostly without monitoring and oversight. Adding more monitors and oversight is not the solution as it's nowhere near accurate for a reason. I'm sure if you all knew the real true numbers of trawling bycatch and the wasted fisheries resources of this state, not including the mammals caught and discarded, you would all agree that trawl fishing is a very bad, very destructive, very indiscriminate type of fishing that can only be described as 'rape'...an act of plunder, violent seizure, and/or abuse while decimating Alaska's own economics and subsistence opportunities without any regard for the environmental impact, long term sustainability, or personal and economic impacts whose lives depend on the resource.

Not only should ADF&G immediately ban all trawling within their jurisdiction and the 3 miles within Alaska's coast in Prince William Sound, but it is imperative you also lobby the Governor of Alaska as well as our Federal Senators and fisheries managers and respective representatives and fisheries managers from WA state and also British Columbia to get trawling banned within 200 miles of all Alaska's waters being the economic sustainability of our state managed local fisheries as well as

our subsistence needs are being crushed, daily, even as you sit at this meeting and debate the issue. You all must be very proud of your service to building your resumes while serving on this Board. What all of the public sees is that you are inept at your responsibilities as Alaska's Fisheries Board members in reference to the Constitution of Alaska Article 8: "...The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people. Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use."

Lastly, I'd like to state the fact that habitat destruction from the trawl fleet around Alaska is obvious. It has been proven that many of the drag marks from the trawl fleet along the ocean's seabed are visible from Google Earth, but prior to that the drag marks were logged on sonar and underwater cameras. Every living organism that uses the Pacific Ocean, Gulf of Alaska, Prince William Sound, Bering Sea and all others, both anadromous and non-anadromous species of fish and eels, mammals, seals, walruses, whales, birds, crustaceans, etc. all rely on a healthy salt water habitat to thrive, survive, and maintain sustainability and continue healthy predictable, manageable fisheries and returns. Preserving the excess for future stocks and more economic stimulus spread further across the state of Alaska of which you represent is your sole duty as board members. The trawl fleet have become legal rapists of the Pacific Ocean and all adjoining waters. You have intentionally manipulated biological data and you also acknowledge the revenue the trawl fleet contributes to the economy albeit at the demise of all the localized traditional fisheries, both subsistence and the domestic local commercial fisheries. Fix it now or always be known to the majority of us citizens as "rapists." By doing nothing you are enabling rape. That is also a criminal offense punishable by law of which each and every one of you that serve on the Alaska Board of Fisheries are NOT immune to. Remember that; you as serve us, Alaskans; not foreigners and not the trawl fleets from Washington State and beyond. It's way past due to react and do something better. Manage without outside bias, not for personal gain, and not for personal feelings and if you want to build upon your personal resumes, represent Alaskans first. Your duty is stated above in Article 8 of the Alaska Constitution.

Thank you and sincerely,

Erik Anderson

Palmer, AK

Submitted by: John Anderson

Community of Residence: Fairbanks

Comment:

The Chitina Personal Use Fishery represents more than just a resource for harvesting salmon; it is a cultural, traditional, and subsistence activity that Alaskans hold dear. Any attempt to limit this fishery would unfairly burden residents who rely on it for sustenance, undermine the principles of equitable resource access, and erode an essential connection to Alaska's heritage.

First and foremost, the Chitina fishery provides Alaskans with a critical opportunity to secure fresh, high-quality salmon to feed their families. Many participants travel long distances at significant personal expense to exercise this right, and for some, the salmon caught in Chitina comprise a large portion of their yearly food supply. Limiting this fishery would disproportionately affect rural and lower-income residents who may lack alternative means to access fresh fish or commercial markets.

Moreover, the personal use fishery reflects a long-standing Alaskan tradition that connects people to the land.

Submitted by: Phillip Anderson , pband3 LLC

Community of Residence: Cordova

Comment:

I am opposed to any new proposals or rules which would limit the amount of time and fishable areas. Every year, I bring a group of veterans up, stay in Cordova and we fish the Ibeck and Alaganik Slough for Silver Salmon. Luckily, these veterans are able to get further up the Ibeck as well as hike into 18 mile. Restricting these fisheries would force us to fish in close proximity to people liking to stay right along the road or the boat ramp at the Slough. What makes the Cordova fishery so appealing is our ability to escape the crowded roadside conditions and have a great time enjoying these rivers and these amazing fish. We keep only our limits and practice ethical catch and release methods to ensure the fish are treated delicately. We only fly fish so these waters are the perfect depth to do that. When the commercial boats are in, fishing becomes very limited and noticeable the closer you are to the highway system and the confluence with 18 Mile. Please reject 86, 87 and 88.

Although I have comments for each of the proposals this year I will only highlight a few that I'm most concerned about and believe will be the best for subsistence and commercial fishing. Please take my comments seriously and don't do the government bureaucratic action of "doing what you want anyone" and saying "everyone had a chance to comment but we know better".

This rule is way over the top. What will this really do other than tell people that you "are the boss and give and take away".

- Proposal 50 – Prohibit the use of chart plotters or fish finders on boats in the Glennallen and Chitina Subdistricts.

The past 4 years have shown an increase in escapement. Although establishing this rule would more than likely increase early escapement there hasn't really been a problem making the goal.

- Proposal 54 – Allow for a maximum of 3 (12-hour) fishing periods where the inside closure area of the Copper River District is closed during statistical weeks 20 and 21.

I'm gathering food for my subsistence unlike commercial fishermen who are catching fish to make money. This proposal equates commercial fishing with subsistence fishing and they are completely different. I have the right to subsistence fish using a guide, particularly because as a Disabled Veteran doing subsistence fishing can be very difficult.

- Proposal 55 – Restrict commercial guide services in the Upper Copper River District when the Copper River commercial fishery is restricted.

The below allow for flexibility and a potential increase of subsistence fish. Giving more to the families that may need more.

- Proposal 58 – Allow the department to liberalize the Chinook salmon annual limit in the Chitina Subdistrict personal use dip net salmon fishery.
- Proposal 59 – Allow the department to liberalize the sockeye salmon annual limit in the Chitina Subdistrict personal use dip net salmon fishery.

Why establish these negative rules? Is there proof that not having these rules has minimized and hurt the escapement of fish? Also, these rules are vague.

- Proposal 60 – Modify the annual limit for the Chitina Subdistrict.
- Proposal 61 – Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.
- Proposal 62 – Allow inseason adjustment of the Copper River personal use maximum harvest limit.
- Proposal 63 – Amend the opening date of the Chitina Subdistrict personal use fishery.

This next one is just plain WRONG. This is like telling me I can fish in the MatSu area but then I can't go to Kenai peninsula and fish as well..I eat all my salmon every year and generally could use more. This proposal totally takes away a law given right established many years ago to help families in their subsistence and wouldn't prove to increase salmon run escapement. If you want to really affect the escapement, do something with the commercial fishing business to stop waste.

- Proposal 64 – Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.

What proof is there that this would do anything to help the subsistence fishing. This is just another bureaucratic rule. Is there any proof that the way reporting is done now (yearly) is negatively impacting the escapement goals? The subsistence catch is only, and maybe, 10% of all the fish caught. Really you are going to make people go from yearly reporting to you have to do it every week? Not needed.

- Proposal 65 – Require a weekly permit and inseason reporting in the Chitina Subdistrict.

Why are you going to remove a way for a Disabled Veteran from claiming his subsistence limit of fish? Using a boat is a safe way of fishing. If I have a boat I should be able to follow the laws and accomplish my Alaskan right of subsistence. If I chose to use a commercial boat to get me to a safe and productive spot on the river I should be allowed to do this. I'm the one doing the fishing, the captain isn't. I'm the one who reports the fish and ensures I don't go over my limit, the captain doesn't. This is just a way to stop capitalism from working. I believe using a boat is much safer than fishing off the cliffs.

- Proposal 68 – Prohibit dipnetting from a boat in the Chitina Subdistrict.
- Proposal 71 – Prohibit guiding in the Chitina Subdistrict fishery.

There are already restrictions and this is too vague.

- Proposal 69 – Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.

If my subsistence fishing is going to be equated to commercial fishing then there should be a complete equality to both in every rule and every law.

From what I read in the online documents the proposals I disagree with take away, remove, delete, my rights as an Alaskan to gather fish in the Copper River for the use of my family. The guided/boat services provide a safe way for me to get where I couldn't get on my own. I'm a 100% Disabled Veteran and would never be able to hike up and down the cliffs thus these rules create an even more restricted opportunity to get my family their rightful Copper River fish. Being able to use a guided service allows this Disabled Veteran a greater chance and maximizing my subsistence limit in a way of my choosing, using my abilities and particularly in the safest way due to my disabilities. Even if I wasn't disabled a boat would be safer and more productive.

To be clear the following proposals I dramatically and wholeheartedly oppose. They take away my rights as an Alaskan to use the resources of this state for my family's subsistence.

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

Also, note i dramatically and wholeheartedly agree with the following proposals. These few give my family greater use of the resources of Alaska.

SUPPORT:: 48, 58, 59, 70

I will be following up to see if my Alaskan rights are limited. I hope you don't treat the commercial fisheries better than my family and me just trying to gather fish for the year.

Sincerely,

Glenn Anderton

Submitted by: Betsy Andrews , SevenFifty Daily, VinePair, Food & Wine

Community of Residence: Brooklyn

Comment:

Dear Board of Fish members:

I support Proposal 16 to close the state-managed Prince William Sound (PWS) pollock trawl fishery. 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. I also support of proposal 14 and recommend regulatory amendments that allow for Alaska DFG staff to manage the PWS pollock trawl fishery for conservation of bycatch species and important habitat under this proposal. 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. 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.

Submitted by: Nick Anliker , AK Expeditions

Community of Residence: Wasilla

Comment:

I believe restricting the dipnet area and even charters more will reduce interest in fishing this and also reduce food in people's freezers. I rely on charter services like AK Expeditions because I am not comfortable enough to navigate these waters but have the trust in them. I also do not want to fight for a spot on shore or repel down the rocks to attempt to put fish on the table for my family.

Submitted by: Scott Anselm

Community of Residence: Wasilla

Comment:

I Support Proposals

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

I Oppose Proposals

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

Dip netting for personal use on the Copper river has become less and less productive. Last year was particularly poor. I support proposals and policies that will better the opportunity for Personal use fisheries on the Copper river.

Respectfully submitted,

Scott Anselm

PC27

Submitted by: Randall Apling

Community of Residence: Wasilla

Comment:

I appose proposition 49 as I chose to hire a boat to dip salmon for safety. And not allowing this will potentially force inexperienced boaters to try to navigate this very dangerous water.

PC28

Submitted by: Easton Armstrong

Community of Residence: Palmer

Comment:

Ok

ASHBURN & MASON P.C.

BENJAMIN J. FARKASH • MATTHEW T. FINDLEY • LAURA (DULIC) FISHER • DYLAN L. HITCHCOCK-LOPEZ
 REBECCA E. LIPSON • DONALD W. MCCLINTOCK III • MICHAEL S. SCHECHTER • THOMAS V. WANG
 OF COUNSEL JULIAN L. MASON III • A. WILLIAM SAUPE

November 26, 2024

VIA EMAIL: dfg.bof.comments@alaska.gov

Chairwoman Märit Carlson-Van Dort
 Alaska Board of Fisheries
 P.O. Box 115526
 Juneau, AK 99811-5526

Re: Public Comments of Ashburn & Mason, P.C., Counsel for Prince William Sound Aquaculture Corporation in Opposition to Proposal 78 (Comment Due Date November 26, 2024).

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

Ashburn & Mason, P.C., counsel to Prince William Sound Aquaculture Corporation (“PWSAC”), submits the following opposition and public comments to the above-referenced proposal.

INTRODUCTION

Proponent asks the Board of Fisheries (“Board”) to arbitrarily override the hatchery permitting decisions of the Alaska Department of Fish and Game (the “Department”) and “[r]educe the permitted egg intake of each Prince William Sound hatchery that produced pink and chum salmon by 25%. Then do an evaluation within five years.” This proposal is a transparent attempt to veto Department permitting decisions, which AS 16.10.440(b) expressly prohibits, override the legislature’s decision to support hatchery activities, and



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financially ruin PWSAC and Valdez Fisheries Development Association (“VFDA”). It is an attack on the hatchery system and all the permit holders, crew, businesses, and communities that rely on a healthy and robust commercial fishing industry in the Prince William Sound (the “Sound”). And it is entirely arbitrary. There is no stated justification for the 25 percent reduction, it is just a percentage pulled from thin air. Even worse, there is no scientifically-validated evidence offered in support of the proposal whatsoever, just conjecture and the opinions of biased special interests that released hatchery fish in Prince William Sound are the cause of fisheries declines and closures *statewide*. For example, there is no credible evidence that pink salmon in prince William Sound are the cause for fishery closures on the Yukon River. Finally, the proposal for an “evaluation” is entirely undefined and too ambiguous a term to be implemented in a regulation.

Putting all the above issues aside, the focus of the comments here is that *the Board lacks statutory authority to amend hatchery permits and override the permits issued by the Department in the manner advocated by Proponent*. As set forth in detail below, the legislature made an express policy decision to create and support a statewide hatchery system and it invested the Department (*not* the Board) with the legal duty to oversee all aspects of hatchery creation, operation, and production,¹ including but not limited to how

¹ AS 16.10.400–.480; 5 AAC 40.005–.990.



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many fish hatchery operators are allowed to incubate and release each year. By statute, the Department, not the Board, regulates hatchery activities that directly impact production levels, such as the harvest of eggs from hatchery broodstock.²

The Board, on the other hand, is tasked with regulating and allocating the harvest of both hatchery and wild salmon among all user groups that the hatcheries were established to serve, including commercial, personal use, sport, subsistence, and hatchery cost recovery.³ The Department and the Board have respected and abided by this division of labor and authority for over 35 years. To our knowledge, the Board has never before attempted to second guess a decision by the Department to authorize a specific level of egg take in a hatchery permit.

The Proposal seeks to disrupt this well-established division of authority by interjecting the Board into the realm of production management. Specifically, the Proposal asks the Board to unilaterally reduce in an arbitrary and draconian fashion egg take levels from hatchery broodstock, which is squarely within the Department's sphere of authority and expertise, and outside the Board's jurisdiction over allocation of harvest levels. While the Proposal does not explain where the Board would derive legal authority to try and shut

² AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5 ACC 40.840.

³ *E.g.*, AS 16.05.251.



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down hatchery operations in the Sound, the Proponent will likely rely on AS 16.10.440(b), which only addresses the Board's limited authority to enact new regulations, subject to the Administrative Procedure Act, to amend hatchery permits regarding the "source and number of salmon eggs," so long as the regulation does not interfere with the Department's issuance or denial of permits required under AS 16.10.400. This provision in no way grants the Board authority to override Department permitting decisions and try and shut down hatchery operations by fiat.

When this statute was enacted in 1979, the legislature's reference to "the source and number of salmon eggs" almost certainly referred to the collection of *wild* salmon eggs, before the hatcheries' cost recovery operations had been fully established. Back in 1979, collection of salmon eggs from wild stocks involved the harvest of wild salmon still swimming out in the ocean. In those early days, egg take from wild salmon hypothetically could have affected the Board's allocative decisions. By contrast, hatchery egg take today is conducted entirely from returning hatchery broodstock, captured in terminal harvest areas, not out in the Sound, with little or no allocative implications.

Even if the statute could be construed to apply to eggs recovered from returning hatchery broodstock, it is an insufficient legal basis for disrupting the Department's comprehensive regulatory regime, which, by statute, includes hatchery production



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planning and detailed permitting requirements. Again, the Board has jurisdiction over harvest levels, and the Department has jurisdiction over all aspects of hatchery production, including egg take levels.⁴

To remove any doubt, the Department and the Attorney General's office both opposed a similar proposal to reduce Cook Inlet hatchery production by 75 percent because "the Board is not authorized to take action that effectively revokes or prevents the issuance of a permit,"⁵ And because "to read the limited grant of authority to the Board over hatcheries set out in AS 16.10.440(b) to permit the Board to effectively veto fundamental policy decisions by the department for which there is specific statutory authority would upset the balance of the statutory scheme chosen by the legislature."⁶

Finally, putting aside the Board's legal authority (or lack thereof) over hatchery permitting, Proposal 78 is also procedurally infirm because it seeks to amend a regulation, 5 AAC 24.370, that has absolutely nothing to do with hatchery permitting or production. Rather, the regulation addresses "fair and reasonable allocation of the harvest of enhanced

⁴ *E.g.*, AS 16.10.445, granting the Department exclusive authority over "the source and number of salmon eggs taken" by hatchery operators.

⁵ Attorney General's Office Comments to Proposal 43, Lower Cook Inlet Meeting Cycle 2023.

⁶ Department Comments to Proposal 43, Lower Cook Inlet Meeting Cycle 2023, quoting Department of Law Memo on Authority of the Board of Fisheries Over Private Nonprofit Hatchery Production (1997).



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salmon among the drift gillnet, seine, and set gillnet commercial fisheries, and to reduce conflicts between these user groups.” Allocation of hatchery fish is a separate issue from hatcheries’ permitted salmon egg take levels. The reality is there is no existing Board regulation addressing hatchery permitting and releases because this is outside the Board’s regulatory purview. The Board may not adopt a proposal beyond its authority and shoehorn it into an existing regulation that is irrelevant to the proposal.

ABOUT ASHBURN & MASON AND PWSAC

Ashburn and Mason is submitting these comments, which focus on the relevant statutes, regulations, and established administrative practice, as a supplement to the comments submitted directly by the PWSAC. Ashburn & Mason has represented PWSAC since its creation in 1974. Our firm worked closely with PWSAC’s visionary founders in the legislative process that resulted in the creation of the private nonprofit hatcheries (“PNPs”) regional aquaculture associations, now codified at AS 16.10.375, *et seq.*

PWSAC’s founders were commercial fishers and community leaders who were responding to repeated wild salmon run failures, and the resulting economic distress throughout the Prince William Sound region in the early 1970s. Working together, the fishermen, local community representatives, the Department, and key legislators developed



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an innovative legal framework for the creation and operation of the state's PNPs and regional aquaculture associations.

Over the past 50-plus years, the statewide hatchery system has been a resounding success and is an integral part of Alaska's world class sustainable fisheries. Alaska's hatcheries have generated tens of millions of dollars of economic benefit every year spread across all user groups, supplementing, but not displacing, the sustained yield of Alaska's wild salmon stocks. In fact, all of PWSACs hatcheries were started with salmon eggs collected originally from local wild stocks. The genetics of all Prince William Sound hatchery fish are therefore traceable back to local streams.

DISCUSSION

I. THE BOARD DOES NOT HAVE VETO AUTHORITY OVER HATCHERY PRODUCTION PERMITS

A. The Department Commissioner Has Primary Authority Over Hatchery Permitting and All Hatchery Operations

1. History and Purpose of the Hatchery Program

The desire of Alaskans to manage their abundant salmon fisheries was a driving force behind Alaska Statehood.⁷ The importance of protecting and developing natural resources

⁷ E.g., *Pullen v. Ulmer*, 923 P.2d 54, 57 n.5 (Alaska 1996); Alaska Legislative Affairs Agency, *Alaska's Constitution: A Citizen's Guide* (5th ed. 2021) at https://akleg.gov/docs/pdf/citizens_guide.pdf (Many Alaskans concluded "that the notion



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such as salmon is embedded in the Alaska Constitution, which directs the legislature to “provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters.” It also requires the legislature to make decisions that “provide for the maximum benefit of its people.”⁸ The Alaska Constitution proclaims that “fish, wildlife, and waters are reserved to the people for common use,”⁹ and dictates that “Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.”¹⁰ Further, the Constitution

of the federal government’s superior vigilance as a trustee of the public interest was really a cloak for the institutional interests of bureaucrats and the economic interests of nonresident corporations exploiting those resources (principally Seattle and San Francisco salmon canning companies and east coast mining conglomerates).”); HOUSE COMM. ON INTERIOR AND INSULAR AFFAIRS, *Act Providing for the Admission of the State of Alaska into the Union of 1957*, H.R. REP. No 85-624 (1958) (The Statehood Act “will enable Alaska to achieve full equality with existing States, not only in a technical juridical sense, but in practical economic terms as well. It does this by making the new State master in fact of most of the natural resources within its boundaries”); Univ. of Alaska Anchorage, Institute for Social and Economic Research, *Salmon Fish Traps in Alaska* (1999), at 14, at https://iseralaska.org/static/legacy_publication_links/fishrep/fishtrap.pdf (“Alaska political entrepreneurs used the [fish] trap issue to rally the citizens of the territory around the quest for statehood.”).

⁸ Alaska Const. art. VIII, § 2.

⁹ Alaska Const. art. VIII, § 3.

¹⁰ Alaska Const. art. VIII, § 4.



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expressly references the goal of “promot[ing] the efficient development of aquaculture in the State,” and protecting Alaska’s economy from outside interests:¹¹

No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood *and to promote the efficient development of aquaculture in the State.*

By the early 1970s, salmon runs were in steep decline throughout Alaska. In the Sound, seining did not open at all in 1972 and 1974 due to dangerously low wild stock returns. In response, the State of Alaska resolved to restore the salmon fisheries. A constitutional amendment provided the basis for limited entry legislation for commercial

¹¹ Alaska Const. art. VIII, § 15. The Constitution has since been amended to provide for the limited entry permit system now in place, *See infra* n.12, but the reference to promoting the “efficient development of aquaculture” remains unchanged.



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fisheries,¹² and the state hatchery program was initiated through the creation of the Fisheries Rehabilitation & Enhancement Division (FRED).¹³

Under AS 16.05.020, the Commissioner must “manage, protect, maintain, *improve*, and *extend* the fish, game . . . of the state in the interest of the economy and general well-being of the State.” The Department is further required to: “develop and continually maintain a comprehensive, coordinated state plan for the orderly present and long-range rehabilitation, *enhancement*, and development of all aspects of the state’s fisheries for the perpetual use, benefit, and enjoyment of all citizens” and “through rehabilitation, *enhancement*, and development programs do all things necessary to ensure perpetual and *increasing production* and use of the food resources of state waters and continental shelf

¹² AS 16.43.400 *et seq.* Alaska’s limited entry fishery essentially provides that only permit holders may engage in commercial fishing. The granting of these permits, and the management of the commercial fisheries, are tightly regulated by numerous state agencies including the State Commercial Fisheries Entry Commission (CFEC), the Alaska Department of Fish & Game (ADF&G), and the Board of Fisheries (BOF). *See generally Johns v. CFEC*, 758 P.2d 1256, 1263 (Alaska 1988) (“The Limited Entry Act has two purposes: enabling fishermen to receive adequate remuneration and conserving the fishery.”).

¹³ AS 16.05.092. As explained more fully below, FRED no longer exists as a distinct division within the Department. However, the operation (though not the ownership) of most or all of the original hatcheries owned and operated by FRED has been transferred to the regional aquaculture associations, under long-term professional services agreements. PWSAC, for example, currently operates the Cannery Creek, Main Bay, and Gulkana Hatcheries, all of which were constructed and initially operated as FRED hatcheries in the early 1970s.



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areas.”¹⁴ Similarly, the Department is required generally to “manage, protect, maintain, *improve, and extend* the fish, game and aquatic plant resources of the state in the interest of the economy and the general well-being of the state.”¹⁵ The Department is also generally charged to do everything possible to assist with hatchery operations.¹⁶

In addition, the legislature created the Fisheries Enhancement Revolving Loan Fund to promote the enhancement of Alaska’s fisheries by, among other things, providing long-term, low-interest loans for hatchery planning, construction, and operation.¹⁷ PWSAC has received significant support from this program over the years, particularly for capital investments.

In 1974, the FRED state-owned and managed hatchery program was expanded to include private ownership of salmon hatcheries with the passage of the Private Non-Profit (PNP) Hatchery Act.¹⁸ The Act stated that its purpose was to “authorize the private ownership of salmon hatcheries by qualified non-profit corporations for the purposes of

¹⁴ AS 16.05.092(1) and (3) (emphasis added).

¹⁵ AS 16.05.020(2) (emphasis added).

¹⁶ AS 16.10.443.

¹⁷ AS 16.10.500–.560; *see generally* Alaska Division of Investments, “Fisheries Enhancement Revolving Loan Fund Program Overview,” April 2007 at <http://www.commerce.state.ak.us/investments/pdf/FEover07.pdf>.

¹⁸ These provisions are now codified at AS 16.10.375 *et seq.*



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contributing, by artificial means, to the rehabilitation of the State's depleted and depressed salmon fishery." Further, as noted above, a separate fisheries enhancement loan program was created in 1976 to provide state financing for nonprofit hatcheries.¹⁹

Over time, the State has transferred operation of some of the FRED hatcheries to other entities, including the nonprofit hatcheries operated by the regional aquaculture associations, concluding that it would be more cost-effective for these hatcheries to be operated by the regional associations. The legislature specifically authorized the subcontracting of state hatcheries in 1988,²⁰ acknowledging that after 17 years of the State planning, building and operating hatcheries, Alaska sought an even more efficient way of ensuring a healthy, robust, and sustainable salmon fishery.²¹

¹⁹ AS 16.10.500 *et seq.*; see also *State Commercial Fisheries Entry Comm'n v. Carlson*, 65 P.3d 851, 867 (Alaska 2003) ("The state operates a revolving loan fund to support investments in developing and operating fish hatcheries and other fish enhancement projects.").

²⁰ AS 16.10.480.

²¹ Alaska's partnership with the nonprofit hatcheries is unique. Almost all states operate hatcheries of some kind (salmon, trout, walleye, catfish, etc.), but no state operates a hatchery program like Alaska's, and no state works with private nonprofit entities to assist the state government in its hatchery programs. By way of example, California has 21 state hatcheries (<https://wildlife.ca.gov/Fishing/Hatcheries>), Oregon has 33 state hatcheries (<http://www.dfw.state.or.us/fish/hatchery/>), and Washington has 76 state hatcheries (<https://wdfw.wa.gov/fishing/management/hatcheries/facilities?county=All>), and all of these hatcheries are operated by the government.



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Alaska law provides that the hatcheries may only be non-profit.²² By design, the hatcheries are allowed to recover operating and capital expenses, as well as costs for research and development and expansion of the production system, including wild stock rehabilitation work.²³ The system is designed to provide benefits to the common property resource users. The nonprofit regional aquaculture associations have no stockholders, owners, or members. Today, five regional aquaculture associations, from Southeast Alaska to Kodiak, including PWSAC, produce hatchery salmon for common property fisheries.

Thus, the Alaska Constitution, combined with numerous statutes, including those creating the Department of Fish and Game,²⁴ the Limited Entry Act,²⁵ the Private Non-Profit Hatcheries Act,²⁶ and the Fisheries Enhancement Revolving Loan Fund,²⁷ together demonstrate a strong and long-standing state policy in Alaska of promoting hatchery development for the purpose of enhancing and ensuring the long-term vitality of Alaska's fisheries.

2. The Department Strictly Regulates All Aspects of Hatchery Creation, Operation, and Production

²² See AS 16.10.380; AS 16.10.400(a).

²³ AS 16.10.455.

²⁴ AS 16.05.010 *et seq.*; see also 5 AAC 40.100–.990.

²⁵ *Supra* note 12.

²⁶ AS 16.10.375–480.

²⁷ AS 16.10.500–.560.



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The Alaska Department of Fish and Game has been charged by the Alaska legislature with final authority over how many fish hatchery operations are allowed to incubate and release each year,²⁸ and to regulate all other details of hatchery operation.²⁹

Pursuant to AS 16.10.375, the Commissioner must designate regions of the state for salmon production and develop a comprehensive salmon plan for each region through teams consisting of Department personnel and nonprofit regional associations of user groups. The Commissioner also has the task of classifying an anadromous fish stream as suitable for enhancement purposes before issuing a permit for a hatchery on that stream. AS 16.10.400(f).

Of particular relevance to the issue presently before the Board, AS 16.10.400(g) requires a determination by the Commissioner that a hatchery would result in substantial public benefits and would not jeopardize natural stocks. The statutes also require the Department to conduct public hearings near the proposed hatcheries, and to consider comments offered by the public at the hearings before issuance of a permit.³⁰

²⁸ AS 16.10.445; 5 AAC 40.300; 5 AAC 40.340; 5 AAC 40.840.

²⁹ AS 16.10.375–.480; 5 AAC 40.005–.990.

³⁰ AS 16.10.410.



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All state hatcheries are operated pursuant to a permit issued by the Department.³¹ Standard permit conditions include: (1) provisions that eggs used for broodstock come from a source approved by the Department;³² (2) no placement of salmon eggs or resulting fry into waters of the state except as designated in the permit; (3) restrictions on the sale of eggs or resulting fry; (4) no release of salmon before department inspection and approval; (5) destruction of diseased salmon; (6) departmental control over where salmon are harvested by hatchery operators; and (7) hatchery location to prevent commingling with wild stocks.³³

Further, there is an intricate system of basic and annual hatchery plans that are reviewed annually by the Department and provide for performance reviews, and in appropriate cases, permit alterations.³⁴ The basic management plans include a complete

³¹ AS 16.10.400; 16.40.100–.199; 5 AAC 40.110–.240.

³² AS 16.10.445. This requirement is related to regulations regarding fish transport permitting. *See* 5 AAC 41.001–.100. These regulations provide that no person may transport, possess, export from the state, or release into the waters of the state any live fish unless that person holds a fish transport permit issued by the Commissioner.

³³ *See generally* Steven G. McGee, *Salmon Hatcheries in Alaska – Plans, Permits, and Policies Designed to Provide Protection for Wild Stocks*, 44 American Fisheries Society Symposium 317, 327 (2004).

³⁴ 5 AAC 40.800–.990. As noted above, there is also an extensive Regional Comprehensive Planning Program established under AS 16.10.375 and 5 AAC 40.300–.370, with full public participation. This process creates Regional Planning Teams who are charged to



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description of the facility, including the special harvest area, broodstock development schedules, and description of broodstock and hatchery stock management.³⁵

Year-to-year hatchery production is regulated through the annual management plans (AMPs) approved and adopted by the Department. For example, each year, PWSAC and the other PNPs across the state work with the Department, which ultimately formulates an AMP for each hatchery. That plan, among other things, determines the number of eggs the hatchery will collect, how the eggs will be collected, the number of fish it will incubate, and how many fish will be released from the hatchery.³⁶ The AMP also addresses how PNPs will conduct their cost recovery harvest at each hatchery and addresses other specifics of hatchery operation.³⁷

B. The Board Cannot Override Annual Hatchery Production Permits Issued by the Department

1. The Board's Statutory Role Is to Allocate Harvest and Fishery Resources Between User Groups

“prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and supplement natural production . . .” 5 AAC 40.340.

³⁵ See generally McGee, at 329.

³⁶ 5 AAC 40.840.

³⁷ McGee, at 329.



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The Board of Fisheries is established by AS 16.05.221, “[f]or purposes of the conservation and development of the fishery resources of the state.”³⁸ In general terms, the Board’s duties complement those performed by the Department. Historically, the Board’s statutory authority has been understood as a mandate to allocate fisheries resources between and among the various user groups and gear types. The Board’s primary function is to: (1) establish fishing seasons; (2) set quotas, bag limits, and harvest levels; (3) determine allowable fishing means and methods; and (4) generally manage the commercial, subsistence, and sport fisheries of the state.³⁹ To the best of our knowledge, however, the Board has always deferred to the Department’s expertise and experience with respect to the detailed management of hatchery permitting and production levels.

2. The Board May Not Second Guess or Override Department Hatchery Permitting Decisions.

As set forth above, the Department oversees and permits hatcheries, and the Board allocates any resulting harvest. Any effort by the Board to override the Department’s permitting decisions and hatchery oversight would be overstepping the Board’s statutory bailiwick. Indeed, the legislature expressly limited the Board’s authority over hatchery permitting in AS 16.05.251(f) which provides (emphasis added):

³⁸ AS 16.05.221.

³⁹ AS 16.05.251.



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Except as expressly provided in AS 16.40.120(e) [authorizing board regulations for the conservation, maintenance and management of species for which an acquisition permit is needed] and AS 16.40.130 [authorizing regulations for the importation of aquatic plants or shellfish for stock], the *Board of Fisheries may not adopt regulations or take action regarding the issuance, denial, or conditioning of a permit under AS 16.40.100 or AS 16.40.120, the construction or operation of a farm or hatchery required to have a permit under AS 16.40.100, or a harvest with a permit issued under AS 16.40.120.*

Consistent with this provision, the legislature also provided in AS 16.10.440(b) that the Board “may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400 – 16.10.470.”

The Proponent here will likely argue that AS 16.10.440(b) grants the Board the authority to upend the Department’s carefully constructed regulatory framework governing



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hatchery production and veto Department permitting decisions.⁴⁰ As an initial matter, the plain text of the statute does not authorize the generalized across-the-board percentage reduction set forth in proposal 78. Rather, the statute’s grant of authority to the Board is very narrow and only allows the Board to “after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of salmon eggs” Under this provision, any Board regulation must amend a *specific permit* and only then modify a specific “*number of salmon eggs.*” It does not permit an across-the-board percentage reduction to all hatchery permits. In this way, Proposal 78 is not a well-considered amendment to a specific permit that would implement a scientifically-

⁴⁰ AS 16.10.440 provides in full:

(a) Fish released into the natural waters of the state by a hatchery operated under AS 16.10.400 - 16.10.470 are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.

(b) The Board of Fisheries may, after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of salmon eggs, the harvest of fish by hatchery operators, and the specific locations designated by the department for harvest. The Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400 - 16.10.470.



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validated-alternate-egg-take number. Rather, it is a special interest group's attempt to subvert the Department's statutory permitting power through a novel application of a statute in a manner contrary to the legislature's carefully crafted balance between the Department and Board that has served all stakeholders well for decades.

Further, any argument that this statutory provision gives the Board broad powers over hatchery egg take numbers reads it out of context and is inconsistent with its historical origins. Under Alaska law, AS 16.10.440(b) must be construed in light of the overall statutory scheme governing Alaska's salmon hatcheries,⁴¹ its legislative history and intent,⁴² and over 40 years of consistent administrative interpretation and practice, during

⁴¹ *E.g.*, *Monzulla v. Voorhees Concrete Cutting*, 254 P.3d 341, 345 (Alaska 2011) (citing *In re Hutchinson's Estate*, 577 P.2d 1074, 1075 (Alaska 1978) (discussing the doctrine of *in pari materia*: the "established principle of statutory construction that all sections of an act are to be construed together so that all have meaning and no section conflicts with another").

⁴² *E.g.*, *Native Village of Elim v. State* 990 P.2d 1, 5 (Alaska 1999); *Kochutin v. State*, 739 P.2d 170, 171 (Alaska 1987) (citing *Hammond v. Hoffbeck*, 627 P.2d 1052, 1056 & n.7 (Alaska 1981)).



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which the Board (to our knowledge) has never attempted to use this statute as the basis for usurping the Department's traditional control over hatchery production.⁴³

Section 440(b) was enacted in 1979 when the hatchery system was in its infancy. Most hatchery egg take was from wild stocks, not returning hatchery fish, which is how egg take is conducted today. The thinking at the time was that salmon eggs harvested from wild stocks were still a "public resource" while the fish were swimming out in the ocean, and the harvest of wild fish for egg take had allocation implications that could potentially fall within the Board's purview. In contrast, today's egg take procedures are conducted almost exclusively from returning hatchery broodstock that are captured in the special harvest areas directly in front of the hatcheries. At that point, the hatchery salmon cease to be a public resource, and their capture and the collection of their eggs have very limited allocative implications. Further, as the Department Commissioner explained to the Board addressing a 2018 emergency petition asking the Board to intervene in hatchery permitting,

⁴³ *E.g., Marathon Oil Co. v. State, Dep't of Nat. Res.*, 254 P.3d 1078, 1082 (Alaska 2011); *Premiera Blue Cross v. State, Dep't of Commerce, Cmty. & Econ. Dev., Div. of Ins.*, 171 P.3d 1110, 1119 (Alaska 2007) (courts defer to reasonable agency determinations that implicate agency expertise); *Bullock v. State, Dep't of Cmty. & Reg'l Affairs*, 19 P.3d 1209, 1219 (Alaska 2001) (discussing that agency decisions based on "long-standing, consistent and widely known" interpretations of agency expertise should be given "great weight").



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“the Board’s authority over the possession, transport and release of live fish had not been delegated to the department when AS 16.10.440(b) was amended.”⁴⁴

Moreover, the legislative history of Section 440(b) indicates that it was never intended to be used by the Board as a back door means of overriding the Department’s permitting authority or limiting hatchery production. The Resources Committee’s letter of intent on HB 359, which included the language in question, states as follows:

There are three other major changes made by the bill:

Section 2 of the bill amends AS 16.10.440(a)(b). The amendment clarifies the role of the Board of Fisheries. The role of the Board of Fisheries as envisioned by the original legislation was to regulate the *harvest* of salmon returning to the waters of the state. That role extends to regulating those fish which are returning as a result of releases from natural systems and also from hatchery releases. There are provisions in other specific locations for the harvest of salmon by the hatchery operator for sale, and use of the money from that sale, for the specific purposes as stated in AS 16.10.450. The added language clarifies that the Board of Fisheries may adopt regulations relating to the *harvest* of the fish by hatchery operators at the specifically designated locations. The Board of Fisheries in the past year or two has enacted regulations relating to those harvests for several of the private nonprofit hatcheries in the state.⁴⁵

⁴⁴ Memorandum from Sam Cotton, Commissioner, to John Jensen, Chair, dated January 14, 2018, Re: Emergency Petition to the Alaska Board of Fisheries requesting the Board to reverse a department decision to allow a 20 million increase in the number of pink salmon eggs to be harvested by VFDA in 2018.

⁴⁵ Alaska House Journal, March 15, 1979, pp. 601–602 (emphasis added).



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The exclusive reference to regulation of harvest, and the absence of any mention of production controls, corroborates the conclusion that the legislature never intended to authorize the Board to limit hatchery production, regulation of which is delegated to the Department under the statutes and regulations discussed above.

The Board's traditional function has always been to allocate harvests among competing user groups, not to regulate production of fish. This legislative history, with its emphasis on "harvest," is also consistent with PWSAC's long-held belief (apparently shared by the Department) that Section 440(b) was intended to cover egg take from wild salmon streams, not to apply to egg take from returning hatchery fish.

Further corroboration of this conclusion is found in AS 16.10.445(a), which unambiguously requires the Department, not the Board, to "approve the source and number of salmon eggs taken under AS 16.10.400–16.10.470," and in AS 16.05.251(9) which grants the Board limited authority to "prohibit[] and regulat[e] the capture, possession, transport or release of *native or exotic fish or their eggs*." (emphasis added). Read together, these provisions demonstrate that the Department has overarching authority on the taking of all salmon eggs (wild or hatchery) while the Board's statutory authority is limited to native/wild eggs.



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Additional evidence that the Department, not the Board, is responsible for regulating hatchery egg take can be found in 5 AAC 41.001 *et seq.* For example, 5 AAC 41.005 prohibits the release of hatchery fish without a permit issued by the Commissioner. Regulation of egg take and release of the resulting salmon fry are obviously two sides of the same coin. The regulatory scheme clearly and consistently assigns exclusive responsibility for regulating those two closely related hatchery activities to the Commissioner.⁴⁶

Given the legislative history, the 30-plus-year pattern of administrative interpretation, the anomalous language in Section 440(b) regarding regulations to “amend...the terms of a permit,” and the Department’s mandate vis-à-vis Section 445(b), it is quite clear that the Board has little or no role in regulating hatchery production, including but not limited to egg take permit restrictions.

Moreover, regulation of hatchery production by the Board would overlap and almost certainly conflict with the comprehensive and detailed hatchery regulations that are currently in place and operating effectively. As noted above, the Department has a rigorous permitting process for new hatcheries, 5 AAC 40.100–.240. There is an extensive Regional

⁴⁶ *E.g.*, 5 AAC 41.090 (granting the Commissioner authority to delegate provisions under 5 AAC 41 to persons within *the Department*).



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Comprehensive Planning program established under AS 16.10.375 and 5 AAC 40.300–.370, with full public participation. By regulation, the responsibility of the Regional Planning Teams is to “prepare a regional comprehensive salmon plan . . . to rehabilitate natural stocks and *supplement* natural production . . .” 5 AAC 40.340 (emphasis added). As mentioned earlier, there is also an intricate system of basic and annual hatchery plans that are reviewed annually by the Department, performance reviews, and, in appropriate cases, permit alterations. 5 AAC 40.800–.990. Production levels are carefully monitored by the Department under these regulations and adjusted if necessary for economic or biological reasons.

In summary, the Department's extensive statutory and regulatory authority for micro and macro hatchery regulation is legislatively defined and quite clear. There is little room for the Board to insert itself into the Department’s very public hatchery regulatory process without unintended and unpredictable collateral consequences that could, and likely would, destabilize a carefully-balanced predictable regulatory regime that has served stakeholders well for decades.

C. Both the Department and the Attorney General’s Office Concluded that a Similar Past Proposal Was Beyond the Board’s Authority

In late 2023, the Proponent here introduced an almost identical proposal (Proposal 43) to the Board to reduce hatchery production of pink salmon in Cook Inlet to 25% of the



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year 2000 production level.⁴⁷ The Attorney General’s office filed comments that this proposal was likely “beyond the Board’s authority, which is limited by AS 16.05.251(f) and AS 16.10.400 – 16.10.440.”⁴⁸ These comments went on to note that the Board:

[D]oes have authority to prohibit and regulate the capture, possession, transport or release of native or exotic fish or their eggs, AS 16.05.251(9), and to amend by regulation the terms of hatchery permits relating to the source and number of salmon eggs, harvest by hatchery operators, and locations for harvest, AS 16.10.440(b), *which may indirectly affect hatchery production*.⁴⁹

Likewise, the Department *affirmatively opposed* the proposal, quoting a prior Attorney General informal opinion from 1997 that “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,” and that “to read the limited grant of authority to the Board over hatcheries set out in AS 16.10.440(b) to permit the Board to effectively veto fundamental policy decisions

⁴⁷ Proposal 43 for Lower Cook Inlet Board Meeting November 28 – December 1, 2023 available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI_all.pdf.

⁴⁸ State of Alaska Department of Law Comments on Proposal 43 Lower Cook Inlet Board Meeting dated November 22, 2023 available at <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/dol-memo-lci.pdf>.

⁴⁹ *Id.* (emphasis added).



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by the department for which there is specific statutory authority would upset the balance of the statutory scheme chosen by the legislature.”⁵⁰ The Department also favorably quoted the informal opinion’s statement that “a Board amendment that puts a hatchery out of operation might be construed as an effective revocation or denial of a hatchery permit, an action that is expressly prohibited by AS 16.10.440(b).”⁵¹ The Department concluded:

The department OPPOSES this proposal. 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.⁵²

The same reasoning applies here. There is no credible, scientifically-validated evidence whatsoever that such a dramatic decrease in hatchery egg take in the Sound will have any impact, positive or negative, on wild stocks, while conversely it would have catastrophic economic effects on the Prince William Sound hatcheries and the many that depend on them for sustenance and their livelihoods. This is a matter of simple arithmetic

⁵⁰ Department Comments on Proposal 43 2023 Lower Cook Inlet Board Meeting available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/lci/rc2_staff_comments_lci.pdf.

⁵¹ *Id.*

⁵² *Id.*



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and should be undisputed. Further, this draconian permit cut would have the precise impact of both overriding fundamental Department policy decisions on hatchery production and could potentially put one or more hatcheries out of operation entirely, thus effectively revoking their permits.

D. The Department Opposes the Current Proposal as Misguided and Beyond the Board's Authority

Consistent with its past position on similar proposals, the Department filed comments on proposal 78 likewise concluding it is beyond the Board's authority.⁵³ Again, the Department referenced the prior 1997 Attorney General opinion to state "Board action that effectively revokes or prevents the issuance of a hatchery permit is probably not authorized." The Department concluded regarding Proposal 78:

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.

⁵³ Department Comments at 198, available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/pws/rc2_staff-comments.pdf.



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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 short, the Department likewise recognizes the legal flaws in proposal 78 as well as its substantive weaknesses.

II. PROPOSAL 78 IS PROCEDURALLY INFIRM BECAUSE IT SEEKS TO AMEND A REGULATION THAT DOES NOT ADDRESS HATCHERY PERMITTING

Proposal 78 is also procedurally improper. It seeks to accomplish its 25 percent reduction in Prince William Sound Hatchery permitting by amending (without even explaining precisely how) 5 AAC 24.370, which addresses the Prince William Sound Management and Salmon Enhancement Allocation Plan. The problem is this regulation contains no provisions whatsoever addressing hatchery production or permitting. Rather, its stated purpose and sole subject is “to provide a fair and reasonable allocation of the harvest of enhanced salmon among the drift gillnet, seine, and set gillnet commercial



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fisheries, and to reduce conflicts between these user groups.”⁵⁴ There is no place in this regulation to incorporate Proposal 78’s proposed “[r]educ[ti]on] of the permitted egg intake of each Prince William Sound hatchery that produced pink and chum salmon by 25%.” Further, there is no current Board regulation addressing permitted hatchery production and releases, whether specific to Prince William Sound or statewide. Given the discussion above, this is because these issues are the purview of the Department, not the Board. In the past, the Proponent of Proposal 78 has proposed similar reductions in hatchery production in both Cook Inlet and Kodiak,⁵⁵ both times seeking to amend 5 AAC 40.820,

⁵⁴ 5 AAC 24.370(a), which provides in full:

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.

⁵⁵ Proposal 59 for 2024 Kodiak Meeting to amend 5 AAC 40.820 to “[r]educe hatchery production to 25% of the year 2000 production as promised in 2000” available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/kodiak_all.pdf; Proposal 43 for 2023 Lower Cook Inlet Meeting to amend 5 AAC 40.820 to “Amend the Cook Inlet Salmon Enhancement Allocation Plan to specify pink salmon production, as follows: Reduce hatchery production to 25% of the year 2000 production as promised in 2000.” Available at https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2023-2024/proposals/LCI_all.pdf.



Ashburn & Mason, Public Comments in Opposition to Proposal 78

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which addressed the creation of hatchery basic management plans *statewide*.⁵⁶ In likely recognition that the Board may not amend a statewide regulation to address hatchery permitting in specific regions, Proponent here has changed tactics and seeks to amend a Prince William Sound-specific regulation addressing hatchery fish. But the fundamental problem remains that there is no place in the Board regulations addressing amendment of hatchery permits. Proponent cannot seek to accomplish this result simply by shoehorning the permit amendment into an unrelated regulation. As discussed above, the Board lacks statutory authority to set egg take policy for returning hatchery fish, full stop. Here, the

⁵⁶ 5 AAC 40.820 provides:

(a) A hatchery operator shall manage the hatchery and its salmon returns in accordance with a basic management plan approved by the commissioner. Before the public hearing held under 5 AAC 40.210 on the proposed hatchery, department staff, in conjunction with the applicant, shall develop a draft basic management plan that includes a facility development schedule of no more than five years. Department staff and the applicant shall present the draft basic management plan and facility development schedule at the public hearing and shall make copies available for public review and comment at the hearing.

(b) If, following the public hearing, the commissioner decides to issue a permit for the proposed hatchery, department staff shall finalize the basic management plan and facility development schedule after all comments have been considered. The final basic management plan, which includes a facility development schedule, describes the conditions under which the permit will be implemented, and is an addendum to the permit.



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regulation Proposal 78 seeks to amend does not pertain to the Board's harvest allocation authority. Even if the Board could amend egg take from wild salmon via a new regulation adopted in accordance with the Administrative Procedures Act, that is not what Proposal 78 attempts to do. Proposal 78 seeks to amend a regulation that is unrelated to the Board's limited authority under AS 16.10.440(b).

Although Proposal 78 is procedurally impermissible, the larger issue is it would be untenable for two agencies to each have authority to set egg take policy for returning hatchery salmon. Stakeholders must be able to rely on the policy set by the agency with statutory decision-making authority for short- medium- and long-term planning purposes. Here, that agency has always been the Department. The stakes are too high to change the status quo for the sake of implementing experimental policy advocated for by a special interest group through a statute that the legislature intended to govern the Board's authority to regulate harvest allocation, not egg take from returning hatchery salmon.

CONCLUSION

Back in the early 1970s, Prince William Sound experienced recurring wild salmon run failures, which caused serious financial distress throughout the region. In response, the framers of the Constitution and the Alaska Legislature took active and far-sighted steps to first establish a state-run hatchery system and, shortly thereafter, the private non-profit and



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regional hatchery regime that has consistently stabilized the runs and enhanced salmon harvests throughout the state since 1974. Overall, Alaska's hatcheries have been a remarkable success and have helped the state's salmon resources to thrive and expand over the past 50 years, creating millions of dollars of positive economic impact, without any demonstrable harm to wild salmon stocks. From the very beginning, every aspect of Alaska's hatcheries' creation, operation, and production have been closely supervised and regulated by the Department, with harvest area and allocation decisions made by the Board. This division of responsibility has served Alaska well for many years and there is no good reason to abandon it now.

For these reasons, the Board should reject Proposal 78.

ASHBURN & MASON, P.C.

A blue ink signature of Matthew T. Findley, written in a cursive style.

Matthew T. Findley

A black ink signature of Dylan L. Hitchcock-Lopez, written in a cursive style.

Dylan L. Hitchcock-Lopez

Alaska Board of Fisheries
Alaska Department of Fish & Game
PO 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,

The fishing vessel Gold Rush is a Kodiak trawler, fishing for Pollock, Cod and Rockfish. This is a small family business, dependent on Alaska fisheries.

Bert Ashley began working on the Gold Rush in the late 80's as Captain and brought his brother, Don, to Kodiak in 1990, to work on the Gold Rush as a deck hand. Bert was able to purchase the boat in 2001.

Bert is a Kodiak resident and began fishing for Pollock in Prince William Sound in the 1990's. This fishery has helped to provide some stability to the business and has been counted on to start the year with a much needed first paycheck for the vessel and her crew.

We, and other Kodiak vessels, have worked closely with ADF&G management over many years, to be able to responsibly participate in a fishery that provides so much benefit to all of us, as well as our community. With daily catch reporting from a limited number of vessels fishing at any one time and "check-in/check-out" procedures, State Managers can provide a very high level of protection to the area.

We appreciate the Pelagic nature of the fishery in this area, avoiding any bottom contact, as well as the 100% catch retention. As an "Electronic Monitoring" vessel, we are very comfortable with both electronic and in person observers and believe in the catch accountability of this system.

This well managed fishery is an important contributor to the overall health of the Prince William Sound, as well as the health of the small fleet of responsible participants and their local communities.

We appreciate the opportunity to share part of our story.

Respectfully,

A handwritten signature in black ink, appearing to read 'Don Ashley', with a long horizontal line extending to the right.

Don Ashley, F/V Gold Rush Fisheries.

Submitted by: Joseph Austin

Community of Residence: Wasilla

Comment:

Proposals 63, 64, and 65.

These proposals are an attack on non-native Alaskan residents. The segregation of rights is getting out of hand. Alaskan residents of all origins have the legal rights to harvest fish, game, and plants for subsistence purposes. It's absurd that these rights be taken away from us to only benefit a small fraction of the Alaskan populace. Let's be real, this is a progressive step to give the Native Corporations even more power and further their agenda to limit the majority of Alaskans, access to most of our accessible resources. It's time to treat everyone the same. We are all residents, we all give back to this great state, and we all deserve to reap the benefits of living here.

There's no reason to limit residents when the resources are sustainable. Fish and Game's research is proof of that sustainability.



B&J Sporting Goods

113 W Northern Lights Blvd. Anchorage AK 99503 | (907) 274.6113 | bnjsg.com

Board of Fisheries Prince William Sound Management Area Proposals 14-17

Alaska Department of Fish & Game

Board of Fisheries Division

Attn: Art Nelson, Executive Director & BoF Members

P.O. Box 115526

1255 W. 8th Street

Juneau, AK 99811-5526

November 25, 2024

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to provide comments on Proposals 14, 15, 16, and 17. As the owner of B&J Sporting Goods, Alaska's largest fishing tackle and bait shop, I write on behalf of our business and the many Alaskans we serve who rely on Prince William Sound for their livelihoods, sustenance, and recreation. These proposals address critical issues that impact the health of our marine ecosystems, the sustainability of our fisheries, and the long-term prosperity of Alaska's communities. We appreciate your commitment to carefully considering these proposals and ensuring that the regulations governing Alaska's fisheries align with the best interests of the people and ecosystems of our state.

Proposal 14: Support

As Alaska's largest fishing tackle and bait shop, we strongly support Proposal 14, which would allow ADF&G to close the fishery if pelagic trawl gear makes bottom contact or Chinook salmon are caught. The waters of Prince William Sound are vital to Alaska's economy, culture, and food security, sustaining over 300 fish species that support subsistence, commercial, and sport fisheries. While midwater trawl gear is intended to avoid seabed contact, evidence shows this is not consistently achieved, resulting in habitat destruction and increased bycatch. This is deeply concerning to us, and we desire to see the damage done to our irreplaceable sea floor mitigate to the maximum possible potential. Allowing ADF&G to act swiftly in these cases protects the broader interests of Alaskans, ensuring our resources are managed sustainably.

Proposal 15: Support

We support Proposal 15, which seeks to modify bycatch limits in the pelagic trawl fishery by decoupling them from pollock harvest amounts. Linking bycatch limits to pollock harvest fails to address the ecological realities of species conservation. By prioritizing the health of vulnerable species like Chinook salmon and rockfish, this proposal reflects responsible resource management that aligns with Alaska's values of sustainability and long-term economic health. The proposal benefits not just commercial interests but also the subsistence and sportfishing communities who rely on these ecosystems.

Proposal 16: Support

We strongly support Proposal 16, which calls for the closure of the Prince William Sound pelagic trawl fishery. This fishery poses a direct threat to the ecosystems and communities of Prince William Sound, contributing to habitat degradation, significant bycatch, and competition with directed fisheries. The Sound is a cornerstone of Alaska's economy, supporting tourism, recreation, and small-scale commercial fisheries. Closing this fishery to pelagic trawl is a necessary step to preserve the balance and health of these interconnected systems for future generations.

Proposal 17: Support

We support Proposal 17, which requires electronic monitoring and observers on pelagic trawl vessels. Transparency and accountability are critical in fisheries management, and electronic monitoring addresses longstanding issues with underreporting and enforcement. Alaska's fisheries have long been held as a global model of sustainability,

and proposals like this reinforce our state's leadership in responsible resource management. While monitoring alone cannot solve all the challenges posed by industrial trawling, it is a vital tool to ensure compliance and provide accurate data for informed decision-making.

Closing Statement

In closing, we urge the Board of Fisheries to pass Proposals 14, 15, 16, and 17 as necessary steps to protect the integrity of Alaska's fisheries and the communities they support. Prince William Sound is not just a vital economic resource but a cornerstone of our culture and way of life. These proposals provide an opportunity to safeguard our marine ecosystems from the harmful effects of industrial trawling and ensure sustainable management practices that prioritize Alaska's long-term interests.

Thank you for your dedication to stewarding Alaska's fisheries responsibly. We appreciate the opportunity to share our perspective and remain committed to supporting efforts that preserve and protect these invaluable resources for future generations.

Sincerely,

Troy Arnold

Owner

B&J Sporting Goods, Anchorage, AK

B&J's Tackle Repair Center, Anchorage, AK

B&J's Tackle Box, Whittier, AK

Submitted by: Todd Baer

Community of Residence: Eagle River

Comment:

Trawling is DESTROYING the ecosystem and it must be stopped for the sale of the flora and fauna of our precious oceans

Submitted by: Ryan Baldrige

Community of Residence: Sterling, AK

Comment:

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

I am an Area E commercial fisherman. I grew up commercial fishing, and have been an owner operator of purse seiner in Prince William Sound since 2012.

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.

Ryan Baldrige

Submitted by: Ryan Baldrige

Community of Residence: Sterling, AK

Comment:

My original comment submission did not have my positions in my letter. 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 grew up commercial fishing, and have been owner operator of purse seiner in Prince William Sound since 2012.

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,

Ryan Baldridge

[REDACTED]

Sterling

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 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: Brittany Banks

Community of Residence: Cordova

Comment:

Oppose #51,52,53 and 78

Dear board of fish please oppose 51,52, 53, and 78. I am a Native village of Eyak tribal member and my family depends on the copper river and Prince william sound commerical fisheries for our main source of income. We reside in cordova year round.

These proposals would have negative economic impacts on my family, the majority of tribal member house holds, and our community.

70 percent of our NVE tribal members are supported by our commercial fisheries.

Thank you.

November 26, 2024

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

Dear Members of the Board of Fisheries,

I am from Cordova, Alaska, and I am tied to commercial fishing.

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 Banks

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

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 have been fishing commercially in Area E Drift for 4 years..

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

Thank you for your time and consideration.

Sincerely,

Micah Banks

A black rectangular redaction box covering the signature of Micah Banks.

Cordova

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

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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: Michael Barner

Community of Residence: Anchorage

Comment:

As a 61 year old lifelong Alaskan I oppose all three proposals (63,64,65) as this is unwarranted and quite frankly ridicules, especially from the Ahtna.

Submitted by: Tony Barnes

PC39

Community of Residence: Palmer, AK

Comment:

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

I am an Area E commercial fisherman. I have been fishing on PWS for 24 years and have been a permit holder for 18 years.

My comments are regarding proposal 44. I'll make this comment brief. I'm sure the amount of gear in the water has been discussed at length, but I think by the time the 100 unfished permits turn in the the extra 50 fathoms it gonna be about the same.

In all my seasons the one thing that makes everything equal on the fishing ground regardless of vessel type or area is net length. If one wants to get out early and stay late they can get the fish, no matter if it's your first season or starter boat. With extra long gear length for those who can afford it, what has been a constant for many decades with change. If this proposal passes I suspect a competitive fishery will be transformed into an aggressive environment on the fishing grounds.

Tony Barnes

PC40

Submitted by: Ian Barrand

Community of Residence: Portland Oregon

Comment:

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

PC41

Submitted by: Paul Barrett

Community of Residence: Fairbanks

Comment:

The highest priority for salmon stocks should go to the individual who harvests it for his own and his family's consumption. Maximum good for the maximum number of Alaskans.

Submitted by: Gordon Bartel

Community of Residence: Willow 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

Alaska residents should have a priority for use of our resources!

Thank you

Gordon

Submitted by: Jeffrey Bartlemus , AK eXpeditions

Community of Residence: Palmer

Comment:

I fully support AK eXpeditions stance on all issues.

This organization makes it possible for myself and family to affordably fulfill our subsistence needs.

They provide a safe and enjoyable means of fishing this great river!

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: Petro Basargin

Community of Residence: Kachamak bay Homer Ak

Comment:

Proposal 5

I strongly oppose this proposal for several reasons. First of all the factory trawlers target bycatch such as bottom fish in which case cause negative devastating effects to the seafloor and the ecosystem effecting may bottom fish and shell fish including yelloweye, roughey and short raker. 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.

Second the language in this Proposal is very specific at targeting to restrict only one gear type. Small boat Commercial halibut fishermen, like myself and many other similar smaller boats that try to only target halibut. We do not target rockfish!

PC45

Submitted by: Robert Bauer

Community of Residence: Wasilla

Comment:

As a retired resident that has lived in the state before it became a state and know what it means to be without sufficient food for the winter. I am against anything that will limit my opportunity to harvest what I consider my share of the goodness of the great state of Alaska. Those who profit from the harvest should take a back seat to those of us who cannot spend the kind of money they require for their services. But being fair about the whole scheme they should be allowed to do their business just so it is not at the expense of us poor folks. Thank you.

PC46

Submitted by: Henry Bauer

Community of Residence: Wasilla

Comment:

I use charters to harvest fish for winter protein for my family. Charters help me to be more responsible and to harvest fish in a safe manner. Limiting this fishery limits my ability to provide for my family. Please continue to help me provide for my family.

PC47

Submitted by: Ross Beal

Community of Residence: Fairbanks

Comment:

Thousands of Alaskan residents have gathered salmon to eat long before the Alaska Legislature statutorily created a Board of Fisheries (BOF) to determine who gets to harvest salmon on the Copper River. Recently there has not been adequate numbers of salmon returning to the Copper River to meet escapement goals and the desires of Alaskans who would prefer to eat salmon from the Copper river. Reducing commercial salmon harvest early in the run will still leave hundreds of thousands of salmon for the industry to take, from the publicly owned resources, for their livelihood...

Submitted by: Ross Beal

Community of Residence: Fairbanks

Comment:

Proposal #51

Thousands of Alaskan residents have gathered salmon to eat long before the Alaska Legislature statutorily created a Board of Fisheries (BOF) to determine who gets to harvest salmon on the Copper River. Recently there has not been adequate numbers of salmon returning to the Copper River to meet escapement goals and the desires of Alaskans who would prefer to eat salmon from the Copper river. Reducing commercial salmon harvest early in the run will still leave hundreds of thousands of salmon for the industry to take, from the publicly owned resources, for their livelihood.

Submitted by: Ross Beal

Community of Residence: Fairbanks

Comment:

I'm writing in strong support of Proposal #14

- Proposal 46 & 47 (Support)
 - o In-season reporting for subsistent and personal use fisheries is essential for best management practices. It is paramount that this information be accessible to local ADFG biologists so that they can make appropriate decisions. Reporting this information should not be a problem as there are multiple avenues for reporting like online reporting or by making a direct phone call.
- Proposal 48 (Oppose)
 - o The commercialization of subsistence fishing directly contradicts the intended purpose of subsistence fishing..... This proposal would have to be tabled and taken up at the state level.
- Proposals 51-53 (Oppose)
 - o Proposals 51, 52, & 53 seek to drastically change the way in which ADFG manages the Copper River district. Delaying openers and having concrete restrictions on fishing time is completely unnecessary due to the diverse run timing that the Copper River has experienced over the years. Additionally, ADFG currently has the capability to limit the commercial fleet early in the season and has done so in prior instances when warranted. Support of these proposals (51-53) strips ADFG the ability to best manage the salmon stocks of the Copper River.
- Proposals 56-57 (Oppose)
 - o Based on the current language, proposals 56 & 57 would have significant impacts on the fishery. Permit stacking among Area E drift gillnet permit holders raises concerns like gear conflict and allocation.

Area E drift gillnet permit stacking would create major specific effects in the Eshamy District. The Eshamy district is geographically the smallest district in the sound and is a district that accommodates both drift and set gillnet permit holders. Allowing permit stacking would exacerbate the amount of gear in such a small area, specifically in areas of large build up (inside the THA, stream closures, line areas etc.) While this proposal aims to reduce the overall number of boats being fished, it does not necessarily reduce the amount of gear being fished in specific areas. Competitive areas of high build up, which inevitably have more boats, would experience major gear conflict. There have already been instances of “gear wrapping” with some drift and set gillnet fisherman. Allowing 50 additional fathoms of gear would worsen these instances. I especially see this being a problem inside of the THA of Main Bay where the setnet fleet is already limited to only being able to fish up to 50 fathoms of gear on a single set. This additional 50 fathoms would further congest an already packed and highly competitive zone in the Eshamy District. Essentially, allowing permit stacking

could eliminate the overall number of boats fleet wide, however, the competitive areas of buildup which almost always draw in a significant number of boats will become more congested and ultimately will lead to more gear conflict. I also foresee there being an issue within the drift fleet. Permit stacking will be beneficial for a few boats that have the means to purchase another permit. This puts a large strain on fisherman that are only able to operate one permit. In order to fully understand what portion of the fleet finds this proposal effective and sustainable for the future of the fishery I think a fleet wide poll would be appropriate. These proposals would have significant effects on the future participation of the drift gillnet fishery in ways that may not benefit the majority of the fleet and the future of this fishery.

Support of these proposals would have disproportionate allocation effects in districts that have concurrent gear groups fishing. The setnet fleet for example in the Eshamy district has the potential risk of being squeezed out overtime with drift permit stacking. The overall productivity of lines throughout the district would substantially increase, which as a result would reduce harvest throughout the rest of the district. I fear that this drastic efficiency of harvest in very specific areas, and the subsequent decline of harvest in the remainder of the Eshamy district, would negatively alter the allocation plan that is currently set in place.

To stay consistent with protecting the longevity and viability of the fishery, some changes to Proposals 56 & 57 should be taken into consideration, if in fact the drift fleet as a whole wants to move forward with this proposal. First, Area E drift permit stacking should be excluded from the Eshamy district. Allowing permit stacking in the Eshamy district would bring forth various complications mentioned above. Primarily, gear conflict issues that are already present in the district would significantly increase. This increase in gear conflict would almost certainly lead to more enforcement issues which during the peak season are already spread thin trying to cover multiple districts for various calls and concerns. Next, permit stacking should only be allowed and carried out when two permit holders are simultaneously fishing on the same vessel. When two Area E drift permit holders are physically on the vessel together, they shall be allowed to fish an additional 50 fathoms, and in total 200 fathoms of gear. Modifying this proposal ensures that new entrants can join the fishery and be physically present in the fishing operation. To alleviate the reliance of enforcement and make it easier on boats that elect to permit stack, the following protocols should be taken into consideration. The additional 50 fathoms of gear shall be shackled in a way that is easy to remove if either a) the

second permit holder is absent from the vessel or b) the boat enters the Eshamy district. Boats that choose to permit stack will also have to display a decal of some sort to signify that they are indeed fishing a “stacked” permit.

- Proposal 78 (Oppose)
 - o Reduction of pink and chum egg take of this amount is not warranted based on the lack of conclusive evidence. Moreover, communities within and outside Prince William Sound could economically suffer from this drastic reduction.
- Proposal 79 (Support)
 - o The completion and efficiency of obtaining PWSAC cost recovery and brood stock is paramount for all user groups. Without the completion of cost recovery and ensuring brood stock, the future operation of the Main Bay Hatchery would be jeopardized greatly. To ensure these goals are met it is important that a) enough fish are available for harvest and b) PWSAC has adequate space to operate. At times, it is required that the Main Bay subdistrict be shut down to commercial fishing which in the past has given exclusive fishing rights to sport and subsistent users. Proposal 79 seeks to prohibit all users from fishing within the Terminal Harvest Area (THA). Prohibiting users from the THA would allow PWSAC appropriate area to operate to the best of their abilities.

This proposal does not eliminate the ability for sport and subsistent user groups from harvesting salmon in Main Bay. Sport and subsistent users can harvest salmon outside of the THA (a small subdistrict of Main Bay). This proposal is not looking to alienate certain user groups from others. Rather, this proposal is looking out for the interest of all user groups and seeks to expedite the cost recovery process and brood stock collection so that all user groups have access to areas within the THA.

- Proposal 80 (Support)
 - o Main Bay and more specifically the AGZ subdistrict has experienced a rapid growth in boat traffic and sport users during the summer months. This increase in boat traffic and sport users (snagging) has led to safety concerns among PWSAC staff members and equipment. Moving the distance back to 250 feet, currently set at 60 feet, would protect equipment that has repeatedly been damaged from fishing tackle and boats.

Closing off the area behind the barrier seine from sport fishing ensures that fish behind the seine (potential brood stock) are not being physically wounded from snag hooks and other angling casualties. Reducing these casualties helps hatchery staff as these fish ultimately are required to be culled from brood stock.

Submitted by: David Belt

Community of Residence: Ocean Park Wa

Comment:

My support of proposal 16 is for the protection of the by catch species.

And to stop the more destruction of the sea floor.

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 Seward, Alaska, and I am tied to commercial fishing. Alaskan salmon hatcheries are how I make a living. It's hard to make a living as it is. A 25% reduction would be very challenging for my family.

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,

Gifford Benoit

A solid black rectangular box used to redact the signature of Gifford Benoit.

Seward, Alaska

Oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

At the Chitina Personal Use fishery Alaskans harvest less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Well over 500,000 sockeye and tens of thousands of kings still are reported upriver every year. Sharing returning salmon among Alaskans is the law under state abundance-based management.

Oppose Proposal #63 and #65 submitted by the Athna Intertribal Fish and Wildlife Committee. Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery on the Copper River.

Oppose Proposal #64 submitted by the Cordova District Fisherman United to restrict Alaskan households gather salmon under both an Upper Cook Inlet personal use salmon fishery permit and a Chitina personal use permit during the same year.

Currently there is ample returning salmon to feed Alaskans in the town of Cordova while allowing families who choose to access publicly owned salmon for family use in the Copper River drainage.

Kirsten Berg

Submitted by: Joseph Berkeland

Community of Residence: Fairbanks

Comment:

I appose 63,64,65 for all Alaska residents!

Submitted by: Alice Bielling

Community of Residence: Anchorage

Comment:

I support the Chenega IRA Council (proposals 15-17) and Alaska Outdoor Council (proposal 14) proposals. I believe we need to stop wasteful bycatch and better protect our waters. We once had an abundance of salmon and other fish. We should do everything possible to restore the land and waterways and that includes protecting our oceans and being good stewards in that way.

Thank you,

Alice Bielling

Submitted by: Richard Bishop

Community of Residence: Fairbanks

Comment:

I support proposals 48,51,52,53,58,59,70 because they help maintain a level playing field in terms of allocation consistent with laws and regulations , and also are consistent with State efforts to ensure sustained yield management of Copper River salmon populations.

I oppose proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66,67,68,69,71 because,in general, they run counter to the principle of a level playing field in terms of allocation among legitimate users of Copper River salmon populations and seek to overturn past actions of the Board of Fisheries to achieve a level playing field in allocation while ensuring sustained yield of Copper River salmon populations.

Charles S. Blackadar Cordova Alaska

I am writing to try and influence the board to take further actions to protect the declining Coho and Chinook salmon runs. I am a casual sport fisherman with no commercial interests, either in direct commercial fishing or activities that benefit from sport fishing. Several of the proposals do not make logical sense from an outside observer.

I am against proposal 44, allowing commercial and subsistence gear while subsistence fishing. This would make enforcement of subsistence fishing rules harder as subsistence fisherman would not have to return to port to change nets where they are subjected to easy inspection of the catch and could remain at sea and possibly sell the fish to tenders. Although the effect on the Sockeye fishery would probably not be significant, it could significantly increase the catch of King salmon driving the species closer to extinction.

I am against proposal 45 for similar reasons. Keeping the inside area closed is only one of many measures we should be taking to protect the King salmon.

Proposal 54 also would allow additional targeting of Kings and should not be approved.

Proposals 86, 87 and 88 are designed to target sport fisherman to the benefit of the commercial fleet targeting wild coho stocks. The Ibek and 18 mile make up less than 5 % of the Coho bearing streams of the copper river delta and copper river according to ADF&G's anadromous sight map. As Coho have dramatically decreased throughout the state, we are taking less than half measures to protect our copper river delta fish. Akin to re arranging the deck chairs on the Titanic we should not distract ourselves with a few cheap shots at sport fishermen but address the root cause. The two delta streams (Ibek and 18 mile) have already seen a dramatic decline in sport fishing success, limiting further the catch and area to fish will accomplish nothing. Limiting the large take of wild fish at the mouths of the streams would have a much larger effect.

Sincerely,

Charles S Blackadar, MD
Family Medicine
Wasilla Medical Clinic
Wasilla, AK 99654
(907) 373-6055

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 commercial fisher in Area E, PWS for over 40 years. I urge the Board to look carefully at all proposals to the intent of what the underlying reason for the submission (usually there is a personal gain reason for the proposal).

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,

David Blake

A solid black rectangular box used to redact the signature of David Blake.

St Maries ID

OPPOSE this proposal with CDFU**OPPOSE this proposal with CDFU****Proposals 25 and 26 - OPPOSE**

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

-Establish a Prince William Sound groundfish personal use fishery.

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

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

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 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 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 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 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

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 have been a commercial salmon fisher in Prince William Sound for over 40 years. Over the years that I have been fishing in the Prince William Sound area, the hatcheries (both VFDA and PWSAC) have been a stabilizing factor in the region for ALL user groups. Personal use fishers, subsistence fishers, sport fishers, seafood processors, Prince William Sound charter operators, and local communities in Whittier, Valdez, and Cordova all benefit from these hatcheries. Additionally, residents of the Upper Copper River area, who benefit from PWSAC's Gulkana operations in Paxton, as well as the State of Alaska, which depends on the reliable fisheries in Prince William Sound, also benefit from the fish tax collected. Yes, the hatcheries benefit my business and family, but they also benefit all those listed above, as well as many others. Lowering the egg take will lower opportunities for all user groups and reduce revenue for local communities and the State of Alaska. This will have a negative impact on any citizen of Alaska, as well as a direct negative impact on those closer to the resource.

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

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

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be


under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

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

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

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

Sincerely,
David Blake


Cordova, Alaska

Dear Board of Fish Members,

The following comments are in reference to the Board of Fish Meeting on Dec 10-16 and more specifically to proposals 86,87 and 88 for Prince William Sound Area

I am addressing all three of these proposals together since I am opposed to all of them for similar reasons even though they are separate proposals. Reasons for opposition to these proposals is listed below.

First, these proposals are unneeded, harmful to some groups and will be ineffectual in producing any of the stated goals of the indicated proposals.

UNNEEDED—The Cordova area targeted by these proposals is in the Eyak, Ibeck and 18 Mile river systems near Cordova. This area has been very effectively managed by the Sport and Commercial employees of the Alaska Department of Fish and Game for many years. From my understanding there has only been one or two years in the last decades that this area has not met its Escapement goal for Silver/Coho Salmon. Even in 2024, when many of the Coho areas in Alaska were not meeting their escapement goals, Commercial and Sport Fishing in these areas had to be curtailed. But in the area these proposals are designed to impact, the escapement goal was reached and Commercial and Sport Fishing proceeded normally. This is a great compliment to the management of the current ADFG employees with responsibilities in this area i.e., Brittany Blaine Roth and Jeremy Botts. They have managed the fishery in this area to insure the adequate return of Coho Salmon to this area. Proposal number 88 is an attempt to remove the ability of the Sport and Commercial Fishery area managers to deal with conditions that affect their specific areas independently. Why would anyone consider a proposal to alter the management of a system that has been working well to provide the escapement that is necessary and meet the stated goal. Thus, the proposal makes no sense to implement since a system already exists to modify fishing activities and the current system has worked well currently and in the past. Thus, I am opposed to proposal 88 and to any proposal to change any system that is working. Maybe the escapement goal should be increased and if so, the current system would still work to meet the new goal.

Likewise, the same comments can be made for proposals 86 and 87. The fishing areas in these proposals has been the same for at least the last 10 years and before that, the 3 mile limit restricting fishing on the Ibeck above the highway didn't exist either. These proposals, 86 and 87, limit areas that have never been limited before. Thus, no argument can be made that it is for the goal of increasing Coho salmon in the river since the escapement goal has been made on a consistent basis practically every year and fishing is and has always been allowed in these areas. There are also dozens and dozens of spawning areas that sport fishermen have no access to so to eliminate these areas seems totally unneeded. Current fishing areas, as they are now, seem perfectly matched with achieving the escapement goal. Again, if more fish are desired in the river system, just increase the escapement goal. Then both Sport and Commercial fishermen have to participate in more limitations and not just the sport fishermen.

HARMFUL TO SOME GROUPS—Proposals 87 would limit access to areas that are most frequently used by both older sport fishermen, young children fishermen and handicapped fishermen. These groups of sport fishermen can not hike into many of the holes on the 18 mile system. Thus, by closing these areas close to the road, several groups will be very much limited in fishing. Other areas are not available for them to get there.

Also, proposals 86 and 87 are directly aimed at only the sport fishing area. It seems as though the people making these proposals think that fishing in areas that have always been open is now hurting the salmon returns and that suddenly sport fishermen seem to be targeting spawning salmon. Closing these areas would close many areas that are not spawning areas as well causing harm to the above groups mentioned. I've seen fish spawning in the Eyak River, Ibeck River and the 18 mile river system. Do you close all of them? Again, if more spawning fish are needed in the rivers, increase the escapement goal.

INEFFECTUAL—I don't believe these proposals would increase the number of returning Coho Salmon. First, the number of Coho Salmon taken by Sport Fishermen in approximately 7% (per ADFG statistics given to me). These changes would not produce even a negligible change in the number of returning Coho. Case in point is when the 3 mile limit was put on the Ibeck years ago and I don't think it made any improvement in the number of Coho returning in the years following the change. Now, to become even more drastic with limitations, and to expect a different result wouldn't seem logical. The numbers of affected fish would be too small since the total harvest of Coho by Sport Fishermen is so small, that implementing these changes would only add complexity to the rules and management of the fishery. Implementing the proposals would harm certain groups and other ways to increase the spawning fish are more equitable to the entire group of users. Thus, I urge you to deny the acceptance of any of the proposals 86,87 or 88.

As a post note:

There has been a lot of concern with the numbers of Sport Fishermen walking in on the Fox Farm Trail and fishing on the 18 mile system. I myself have observed as many as 11 vehicles parked at this trailhead and I too am concerned about this. The fault of this occurring is put on the Sport Fishermen, but I believe this is the symptom of a problem and not the cause. The cause of this overuse of the 18 mile system is due to the fact that after the escapement goal is met, multiple long duration commercial openers are held in the area. Some commercial fishermen fish on these openers in the Egg Island Channel and very close to the mouth of the Eyak (and consequently the Ibeck) Rivers. Once a commercial opener is held, it takes several days for Cohos to reestablish in the rivers. Thus, if 2 openers per week are held, it takes fish out of the Eyak and Ibeck for about 4 days. Then, when sportfishermen try to fish on the Eyak or Ibeck and the fishing is VERY poor, they go to the place where they can catch fish, the 18 mile system. No one is walking in there because they like the 45 min walk in and out, especially when carry fish out. They are walking in there because that is the only place to catch fish. If other areas are closed like more of the Ibeck or areas on the 18 mile system, it will only increase the congestion even more. To end the congestion on the 18 mile system, restrict the commercial fishermen from fishing in the Egg Island channel and so close to the Eyak river mouth. If this is not addressed soon, I feel it will end the viability of the Sport Fishing operators in the Cordova area, including me!

Thank you for reading my concerns,

Calvin Blohm
Owner Hideaway on the Eyak
801 787 6676

Proposal 86- Oppose

Reducing the amount riverbank to fish along Ibek Creek will force the already extremely overcrowded area to accommodate even more fishermen and since there will likely not be fewer fishermen, the fish take will likely not be decreased. My understanding is that this issue has been previously considered and that the current area restrictions are adequate.

Proposal 87 – Oppose

We have been coming to Cordova to fish for Coho salmon for more than (15) years now, and it isn't clear to me where this restriction would be.

We usually come to Cordova to fish on the Eyak River and are usually able to fish for about (5) days. During the week we are there, there are normally (2) commercial openers. On the day or two after each commercial opener, the number of fish in the Eyak River is extremely limited and the only other areas we have to fish are on Ibek Creek, which is extremely overcrowded already, or on the (18) mile system, along the Copper River Highway.

I am 79 years old now and my wife is 75, so with advancing age and decreasing mobility, the only places we can access, other than from a boat on the Eyak River, are on the 18 mile system along the Copper River Highway. To close any of this area would leave us, literally, with no accessible place to fish.

Proposal 88- Oppose

The relative impact on the fishery between commercial fishing and sport fishing is so dramatically different that it seems that different management and rules are warranted. My understanding is that ADF&G does have different committees to manage each of these interests, so it isn't clear why management of the two should be combined or related. The current system seems to be managing the fishery sufficiently that the escapement goal is met consistently. Please continue to manage sport fishing separately from commercial fishing.

Donald Blohm

Alaska Department of Fish and Game
Board of Fish Meeting
Prince William Sound Area

Date of Meeting: December 10-16, 2024
Cordova, Alaska

Dear Board of Fish Members:

I am writing this letter to provide feedback on Proposal 86, 87 and 88 to be discussed and considered at the Board of Fish Meeting in Cordova, AK on December 10-16, 2024

Proposal 86

I am opposed to proposal 86. The proposal is to limit access to Ibeck Creek for fishing 1 and ½ miles above the Copper River Highway on and after September 21st of every year. This proposal is to supposedly protect spawning areas in Ibeck Creek. Approximately 10 years ago Ibeck Creek was closed to any fishing 3 miles above the highway because of spawning concerns. Now, evidently, the fish have moved downriver another 1 ½ miles to spawn there. This proposal would only cause confusion among sport fishermen and would provide limited benefits. There are spawning fish above and below this arbitrary point before and after September 21st. I have witnessed spawning fish in the lower Eyak and Ibeck many times and even before the September 21st date. Are we supposed to close all of these areas? What about the multiple commercial openers that are going on well into the month of October? Is the purpose just to eliminate sport fishing yet have increased harvest of “spawners” by the commercial fleet continuing on for nearly a month after sport fishermen are barred from fishing in this area. Another point is that as the glaciers have receded, many more small streamlets have opened up allowing for increased spawning areas above the existing 3 mile barrier. There are dozens and dozens of small streams throughout the Copper River Delta that are literally impossible for sport fishermen to access and to cut off another 1 1/5 mile section of the Ibeck after the 21st of September would only cause even more congestion on the 18 mile system. If sport fishermen are desired to come to Cordova to fish, why are so many proposed changes made every 3 years to limit access etc.? If more spawners are wanted to spawn, increase the escapement goal. Then the professional commercial and sport fishing managers can manage the fishing activities to achieve the escapement goal. Currently, I understand that the desired escapement goal is routinely achieved in this area. Another restriction on a relatively minor user group is without warrant.

Proposal 87

I am opposed to this proposal. This proposal is like the proposal in 86. The escapement goal is being met, why are you considering adding more and complicated regulations to fix a problem that exists only if the current escapement goal is not adequate. Also, if these areas continue to be closed down and access limited even more, then the congestion and over crowding everyone is concerned with will only increase until eventually it is all shut down. Sport fishermen, I am told by the Alaska Department of Fish and Game is only a minor harvester of Coho Salmon. It seems impossible to correct perceived problems (perceived because the escapement goal is routinely met) by placing limitations on one of the smallest user groups of the resource. The areas in proposals 86 and 87 have been open for many, many years and again, the escapement goal is reached. If over crowding and increased fishing pressure is the problem, then you can't fix over crowding by limiting even more areas. Besides, I have sport fished for Coho for

many years and I don't know of any sport fisherman that is targeting the actual spawning of fish. Proposal 86 and 87 are trying to solve a problem that doesn't exist as far as meeting the stated goals of the ADFG escapement goal and their implementation would only lead to over crowding in other areas.

Proposal 88

I am very much opposed to this regulation of eliminating the sport fishing managers to make their own decision about how sport fishing should be conducted in this area. Several years ago, the sport fishing manager in the Cordova area had to make a decision to limit the harvest of Coho salmon in the Copper River delta area to 1 fish. It was painful, but it did show that the system currently in place is working and is a viable system. Again, if the system as it stands now was not working, the escapement goal would not be achieved regularly in this area as it has been. I have heard that the escapement goal was not achieved only once in the last several decades in this area. Why would a proposal be considered to alter this system of management when it has achieved such a record of success. One final note...As we have fished the areas mention in the proposals, we have met and talked with families with small children and people who are handicap. This is a wonderful place for all to enjoy. Therefore, I urge you to reject proposal 88

Thank you for the opportunity to provide input on these proposals.

Leesa Blohm



Submitted by: Joshua Bloink

Community of Residence: Anchorage

Comment:

I have been using the Chitina personal use dipnet fishery to feed family for the last 6 years. We have been careful to dial in the amount of fish that we use each year. We actual didn't dipnet at Chitina in 2019 so that we could use the rest of the 2018 fish. We know what we need, and take only what we need. I doubt seriously that any such argument could be made from the commercial side of the fence. I urge you to protect this fishery for Alaskans. I have indicated my support or opposition on the form below.

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 fishing the Copper river for 10 years. It is the sole income of my family with 2 young children

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 Blume

A black rectangular box redacting the signature of Michael Blume.

Juneau alaska

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

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 83 - OPPOSE

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

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

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

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

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry,

it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

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

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

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

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

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

Submitted by: Dadrian Blythe

Community of Residence: Anchorage

Comment:

I believe proposals 14,15,16,17, and 18 need to be edited. We need more regulations on trawling or to abolish it completely. The well being and food security of the Alaska people's now and future depend on it.

Submitted by: Geri Boney

Community of Residence: Tok

Comment:

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.

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. This would only make shore dipping more congested.

Submitted by: Joseph Boney

Community of Residence: Tok

Comment:

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.

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 Prince William Sound and the hatcheries play an integral role in our salmon returns. Hatcheries provide the majority of salmon harvests to us in Prince William Sound. We need to preserve and improve our hatcheries, not downsize them! I can only assume Proposal 78 would make my job as a commercial harvester 25% less economically viable with 25% less fish in the water.

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,

Rowan Borden-Deal

A solid black rectangular box used to redact the signature of Rowan Borden-Deal.

Cordova, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I am from Kasilof, Alaska, and I am tied to commercial, sport, and subsistence fishing. As a third-generation Alaskan fisherman, Alaska's hatcheries have provided my family with careers and put food on our table for 75 years. If we continue to steward this resource responsibly, this legacy will continue seven generations from now. A 25% decrease in egg take would harm my family even in the best of years, but especially this year, as we come off a disastrously low return. Decreasing the egg take in a year when the vast majority of fishermen couldn't even make payments is a blow that will negatively impact thousands.

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,
Gregory Bosick

A solid black rectangular box used to redact the signature of Gregory Bosick.

Kasilof, Alaska

Submitted by: Richard Bottass

Community of Residence: Eagle River

Comment:

Support : 48/58/59/70

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

Dip netting off a boat in the Copper is the way I feed my family each year. The annual limits currently set are not quite enough for us .An increase would actually help us. We are in a household with two Disabled Veterans, and we rely on this fishery for our annual subsistence to get by on. We can't afford not to have this opportunity/ option.

Richard Bottass

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 Wasilla, Alaska, and I have been gillnetting in Prince William Sound since 2006. Most of the fish I catch are hatchery fish, so reducing production by 25% would directly affect my livelihood. I am all for managing to sustain returns, but I don't see the necessity of reducing production to accomplish that. Please don't negatively impact so many people's income by acting prematurely on unfounded speculation. As I age, I am unable to fish as aggressively as I could in my younger years, which results in less income. If hatchery production is cut by 25%, my catch and income will drop enough that I may not be able to continue fishing.

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.

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 Bottoms

[REDACTED]

Wasilla, Alaska

2024 Board of Fish Written Comments

#5 I strongly oppose this proposal. The halibut fishery is federally managed. There have been no surveys done on rockfish in PWS in a number of years. Currently the state as laws in place that make it illegal to fish for halibut in both PWS and federal waters during the same trip

#18-24 I support theses proposals

#45 I support this proposal because there is no conservation benefit from restricting area in a catch limit subsistence fishery.

#47 I support.

#48 I strongly oppose this proposal because I believe guiding subsistence dip netters from a boat is not subsistence. It is not C&T and i feel the practice should be outlawed for all upper river fisheries.

#56-57 I strongly support this proposal. Something needs to be done to make this fishery more viable,stacking permits mean less nets in the water, I agree more with all points in proposal 56 If stacking aloud it must be legal for one individual to own and fish two permits

#78 I strongly oppose this proposal, this has no science behind it

I also support any proposal that would help open up crab,herring and octopus fisheries in PWS They are need to help support the economy of towns like Cordova

Chris Bourgeois

November 24, 2024

Chairwomen Märit Carlson-Van Dort
Alaska Board of Fisheries
Board Support Section
PO Box 115526
Juneau, AK 99811

**RE: Michael Bowen Comments on 2024 Prince William Sound Finfish and Shellfish Meeting
Proposals 75, 76 and 77**

My name is Michael Bowen. I am a second generation PWS commercial fisherman. I have been involved with most PWS fisheries during my career for the last 55 years. I have served on the PWS/CR advisory committee, BOF working groups, PWSAC Board of Directors for 18 years and participated in the BOF process for the last 44 years. My main source of income is the PWS Drift Fishery. Thank you for the opportunity to participate in the BOF public process to help formulate regulations that result in healthy fisheries.

Hopefully the spreadsheets I have provided will give you a clearer picture of the state of the drift fishery and PWS enhanced salmon allocation and to what degree who is benefiting from it.

The PWS Drift Fishery has been in decline these last five years. It's been a "slow death by 1000 cuts" over the years and due to several factors. Two of the biggest factors regarding enhanced salmon is the decisions of the BOF to not address the disparity in enhanced salmon allocations that the current plan contains. Another major factor was the Esther chums that were produced for the benefit of the drift fishery and PWSAC reallocating them to the seine fishery by removing them out of Esther Subdistrict and to the remote release sites at Port Chalmers and AFK hatchery. This was done in violation of the PWSAC Allocation Policy that was in effect at the time.

PROPOSAL 75

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

Change the allocation trigger from less than 45% to less than 50% and remove the five-year rolling average and the Esther Subdistrict chum fishery to allow for one piggy bank at the Port Chalmers chum fishery.

As the author of the proposal, I **Support** it.

The language in Proposal 75 and the ADF&G comments in RC2 on pages 195 & 196 cover the proposal very well. But I would add to please see the included spreadsheet on PWS Salmon Enhancement Allocation Totals Since Adopted 2006 to 2023. If the goal is to deliver 50% to a user group, then it makes sense to set the trigger at 50%. Especially when the drift fishery is

behind by 5% on the PWSAC only calculation and behind by 67% on all enhanced salmon. The 68 million PWSAC calculation that drift fishery is behind comes to an average of 3.8 million a year in lost revenue which comes to an average of \$7,500.00 a year per drift permit. It may not seem like much but with the state of the drift fishery it would have been very helpful.

PROPOSAL 76

5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan. Change the allocation trigger from less than 45% to less than 50% and remove the Esther Subdistrict chum fishery to allow for one piggy bank at the Port Chalmers chum fishery.

These two proposals 75 and 76 are similar except proposal 75 removes the five-year rolling average. The language in Proposal 76 and the ADF&G comments in RC2 on pages 204 & 205 cover the proposal very well.

I would **support proposals 75 and 76 as amended**

I would propose to amend **proposal 75 and 76** to change the allocation triggers to 52% Drift and 48% Seine. The reason is that the set net allocation is 4% that comes off the top of the enhanced salmon allocation. The drift and setnet fishery share and compete for the same enhanced salmon resource at the Main Bay Hatchery. So, for every fish the set netters catch that one less available to the drift fishery. The seiners and set netters do not share or compete with the same enhanced salmon resource so in essence the seine fleet has no skin in the game. It's only fair that the seiners cover half of the 4% setnet enhanced salmon allocation.

PROPOSAL 77

5 AAC 24.370. Prince William Sound Management and Salmon Enhancement Allocation Plan. **Repeal the definition of enhanced salmon stocks by removing ["ENHANCED SALMON STOCKS" MEANS SALMON PRODUCED BY THE PRINCE WILLIAM SOUND AQUACULTURE CORPORATION"] or change the name of the plan to the PRINCE WILLIAM SOUND AQUACULTURE CORPORATION MANAGEMENT AND SALMON ENHANCEMENT ALLOCATION PLAN**
As the author of the proposal, I **Support** it.

The language in Proposal 77 and the ADF&G comments in RC2 on pages 206 & 207 cover the proposal very well.

This proposal asks that the value of all enhanced salmon produced in PWS/CR to be included in the allocation plan. The current plan is based on value and by excluding the most successful pink salmon hatchery in the Western Hemisphere that produces 42% of the enhanced pink salmon by value in PWS. This completely distorts the value and the plan in favor of one commercial user group over the other commercial user groups. Since the adoption of the current plan in 2006 the seine fishery harvested 67.66% of the enhanced salmon value compared to the drift fisheries at 33.34% in PWS. (Please see attached spreadsheet produced by

Michael Bowen utilizing ADF&G Prince William Sound Area Finfish Management Reports from 2006 through 2023).

When you factor in these numbers the current plan does not meet its intended purpose to provide a fair and reasonable allocation of the harvest of enhanced salmon. It completely fails 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. When PWSAC, State of Alaska and VFDA started building hatcheries in PWS, pink salmon was the quickest and easiest to produce which benefited the seine fishery. The gillnet and setnet gear groups were asked to be patient and when the production of other species came online enhanced salmon production would "float all boats equally based on historic values prior to enhancement"

The drift fishery deserves a fair allocation plan that includes all enhanced salmon produced in Area E. The drift fishery pays a mandatory 2% enhancement tax on every dollar and fish that they catch including wild stocks. Before the vote on the mandatory 2% enhancement tax there was a voluntary 1% percent enhancement tax that was matched by the processors. I voluntarily paid this tax under the expectation that drift fishery would receive a fair share of the enhanced salmon resource once the programs were up and running.

This proposal is my preferred change to the plan as it will bring the value of the VFDA program out into the light of day. It took me several days to collect the value from the **PRINCE WILLIAM SOUND AREA FINFISH MANAGEMENT REPORTS 2006 -2023.**

The result of passing any of these proposals is that the drift fishery will get to fish Port Chalmers on steady basis which will result in the drift fishery getting a portion of their chums returned to them. It won't get them 50% but it will be a move in the right direction. Getting all the enhanced salmon into the plan will be a moral victory.

Thank you,

Michael Bowen

Attachments included: Spreadsheets produced by Michael Bowen
PWS Salmon Enhancement Allocation Totals Since Adopted 2006 to 2023 and CFEC – PWS
Salmon and Permit Values 2006 - 2023

PWS Salmon Enhancement Allocation 5AAC 24.370
Totals Since Adoption 2006 to 2023

Year	Seine - PWSAC	Drift Gillnet - PWSAC	PWSAC %	45% Allocation Triggered	VFDA Value	PWSAC + VFDA %	Port Chalmers Value
2006	\$5,851,983.00		45.50%	Seine	\$3,870,706.00	58.10%	\$1,260,827.00
2007	\$16,394,816.00	\$7,010,574.00	54.50%		\$0.00	41.90%	
2008	\$36,411,663.00	\$8,365,677.00	66.20%		\$12,087,707.00	77.30%	\$1,897,529.00
2009	\$9,722,045.00	\$18,059,466.00	33.80%		\$0.00	22.70%	
2010	\$64,975,204.00	\$18,059,466.00	66.80%		\$14,175,440.00	73.69%	\$5,471,892.00
2011	\$13,464,746.00	\$15,553,269.00	33.20%		\$0.00	26.30%	
2012	\$21,361,107.00	\$36,546,803.00	38.50%		\$22,142,977.00	67.20%	
2013	\$55,194,763.00	\$15,553,269.00	61.50%	Drift	\$0.00	32.80%	
2014	\$14,894,564.00	\$23,236,219.00	64.00%	Drift	\$20,135,956.00	69.95%	
2015	\$23,835,054.00	\$36,546,803.00	36.00%	Drift	\$0.00	30.05%	
2016	\$2,279,055.00	\$23,236,219.00	34.80%	Drift	\$15,657,814.00	55.63%	
2017	\$24,231,312.00	\$30,375,938.00	65.20%	Drift	\$0.00	44.37%	
2018	\$17,232,200.00	\$25,052,932.00	41.30%	Drift	\$15,699,127.00	54.95%	
2019	\$22,101,479.00	\$20,380,294.00	58.70%	Drift	\$0.00	45.05%	
2020	\$9,265,912.00	\$13,178,132.00	68.80%	Drift	\$24,551,057.00	76.09%	
2021	\$27,566,130.00	\$13,947,405.00	31.20%	Drift	\$0.00	23.91%	
		\$20,380,294.00	42.30%		\$24,930,441.00	66.14%	\$987,289.00
		\$13,178,132.00	57.70%		\$0.00	33.86%	
		\$13,947,405.00	64.40%		\$18,988,840.00	76.46%	
		\$18,746,118.00	35.60%	Drift	\$0.00	23.54%	
		\$24,386,998.00	14.00%	Drift	\$6,376,720.00	38.30%	
		\$17,589,144.00	86.00%		\$0.00	61.70%	\$2,533,190.00
		\$6,078,011.00	56.40%		\$15,521,100.00	67.95%	
			43.60%		\$0.00	32.05%	
			41.40%		\$12,256,592.00	54.73%	\$3,062,618.00
			58.60%		\$0.00	45.27%	
			55.70%		\$9,328,394.00	64.11%	
			44.30%	Drift	\$0.00	35.89%	
			60.40%		\$7,618,407.00	73.53%	\$1,968,529.00
			39.60%		\$0.00	26.47%	
			67.50%		\$18,673,454.00	77.67%	\$1,567,317.00

PWS Salmon Enhancement Allocation 5AAC 24.370

Totals Since Adoption 2006 to 2023

	\$13,292,185.00	32.50%	\$0.00	22.33%	
2022	\$8,631,964.00	37.80%	\$25,313,247.00	70.49%	\$5,834,595.00
	\$14,208,932.00	62.20%	\$0.00	29.51%	
2023	\$12,971,573.00		\$11,787,732.00		\$28,749.00
	\$12,198,865.00		\$0.00		
			Drift		

45% Allocation Triggered
Seine - 1 Drift - 9

Port Chalmers Seine
Value
\$24,612,535.00

	PWSAC Total Value	PWSAC Percentage	VFDA Total Value	PWSAC/VFDA Value
Seine	\$386,385,570.00	54.83	\$279,115,711.00	\$665,501,281.00
Drift	\$318,206,962.00	45.17		
Drift Shortfall	\$68,178,608.00		Drift Total Enhanced Shortfall	\$347,294,319.00
PWSAC Only - Drift			PWSAC/VFDA Percentage PWSAC + VFDA Drift	
Average Shortfall		Seine - 67.66%	Average Shortfall	
Per Year	\$3,787,700.00	Drift - 32.34%	Per Year	\$19,294,128.00

CEFC - PWS Salmon and Permit Values 2006-2023
Compiled by Michael Bowen

Year	Gear Type	Fishery Total Gross Earnings	Average Gross Earnings	Average Permit Value	Lowest Value
2006	Seine	\$11,413,062	\$102,820	\$26,100	Lowest Value
	Drift	\$27,497,718	\$55,890	\$51,600	Lowest Value
	Set	\$849,458	\$32,671	\$61,500	
2007	Seine	\$35,955,115	\$299,626	\$30,900	
	Drift	\$34,903,708	\$69,529	\$52,000	
	Set	\$1,365,898	\$54,636	\$61,500	
2008	Seine	\$52,047,970	\$369,135	\$70,200	
	Drift	\$33,038,463	\$65,165	\$90,300	
	Set	\$1,498,602	\$59,944	\$59,500	Lowest Value
2009	Seine	\$10,451,033	\$67,864	\$75,300	
	Drift	\$32,395,561	\$63,396	\$110,900	
	Set	\$1,704,971	\$63,147	\$59,500	
2010	Seine	\$82,212,876	\$472,488	\$100,500	
	Drift	\$47,761,055	\$92,025	\$128,100	
	Set	\$4,085,598	\$145,914	\$59,800	
2011	Seine	\$37,692,355	\$205,969	\$140,000	
	Drift	\$50,157,831	\$97,774	\$162,100	
	Set	\$3,215,004	\$110,862	\$59,800	
2012	Seine	\$48,550,227	\$216,742	\$168,700	
	Drift	\$60,292,098	\$115,502	\$180,200	
	Set	\$3,541,396	\$122,117	\$61,000	
2013	Seine	\$100,114,877	\$476,738	\$168,000	
	Drift	\$52,020,635	\$99,087	\$195,200	
	Set	\$2,751,729	\$98,276	\$119,300	
2014	Seine	\$39,955,914	\$179,982	\$204,600	
	Drift	\$54,567,982	\$104,137	\$224,100	
	Set	\$3,094,233	\$106,698	\$190,800	

CEFC - PWS Salmon and Permit Values 2006-2023

Compiled by Michael Bowen

Year	Gear Type	Fishery Total Gross Earnings	Average Gross Earnings	Average Permit Value
2015	Seine	\$67,352,063	\$311,815	\$186,700
	Drift	\$37,828,639	\$72,747	\$224,200
	Set	\$2,038,046	\$70,277	\$190,800
2016	Seine	\$14,547,157	\$69,272	\$147,900
	Drift	\$36,830,697	\$71,239	\$155,400
	Set	\$1,921,953	\$66,274	\$190,800
2017	Seine	\$81,625,986	\$354,896	\$154,500
	Drift	\$41,765,301	\$82,868	\$147,800
	Set	\$1,831,722	\$63,163	\$190,800
2018	Seine	\$41,249,462	\$176,280	\$165,000
	Drift	\$36,968,639	\$72,773	\$153,900
	Set	\$1,956,120	\$75,235	\$190,800
2019	Seine	\$56,042,219	\$235,472	\$173,300
	Drift	\$46,680,112	\$92,619	\$141,400
	Set	\$2,665,334	\$102,513	\$193,000
2020	Seine	\$27,885,260	\$127,914	\$162,600
	Drift	\$12,712,062	\$26,049	\$135,700
	Set	\$942,215	\$36,239	\$186,700
2021	Seine	\$79,022,563	\$372,748	\$155,700
	Drift	\$26,555,324	\$55,672	\$114,100
	Set	\$864,969	\$36,040	\$236,500
2022	Seine	\$48,729,436	\$236,551	\$194,700
	Drift	\$30,186,672	\$66,490	\$111,700
	Set	\$2,209,490	\$84,980	\$230,100
2023	Seine	\$36,654,097	\$172,085	\$247,400
	Drift	\$27,362,528	\$61,627	\$99,100
	Set	\$1,102,110	\$50,096	\$227,600

Peak Value - Up 334.49% Since 2006

Peak Value - Up 297.47% Since 2008

Peak Value - Up 847.89% Since 2006

Down 55.79% Since 2015

Submitted by: L.Bruce and Judy Bowler

Community of Residence: Juneau

Comment:

We fully support AOC's position on industrial Trawl fishing

Submitted by: Steve Box , Worthy Seafoods Family run commercial fishing business in Alaska

Community of Residence: Juneau

Comment:

proposal 14-17

Preserving Alaska's fishing future should be a top priority for all Alaskans. The amount of trawl waste is truly unbelievable. While the industrial trawl fleet continues to throw over massive quantities of high end seafood, like halibut, salmon, crab, rockfish and other important species, the rest of Alaska (commercial, sport and subsistence) pays for it with reduced catch limits and closed seasons. The future depends on solid management decisions and far less waste. As a 40+ year commercial fisherman I support proposals 14-17 and any measures to control the trawl waste and protect the fisheries habitat. My 2c halibut quota has been reduced approximately 65% over the last 15 years and continues on a downward trend. We all need to protect our valuable Alaska fisheries resources and quit throwing them overboard as waste.

Submitted by: David Bragg

Community of Residence: Fairbanks

Comment:

Hello, I have a family with 4 Alaska resident adults and 2 children. With respect to the proposals and in the best interests of my family please take into account the following:

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: David Branshaw

Community of Residence: Cordova

Comment:

I support proposal 14,15,16,17. Trawl fisheries are destroying habitat and fishery resources wherever they occur. Please stop all trawling in state waters thank you.

Submitted by: Doug Bratten

Community of Residence: North Pole

Comment:

I am writing to express my SUPPORT for;

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

Also, I am writing to express my OPPOSITION for;

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

Submitted by: Douglas Bratten

Community of Residence: North Pole

Comment:

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

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

Every year, we Alaskan Residents lose more and more Personal Use rights and/or have more restrictions put upon us, while Outside commercial interests seem to always gain.

It's time our State officials stick up for Alaskan Residents and preserve our Personal Use rights. Tell the Lower-48 commercial interests to go pack sand.

Submitted by: Gregory Bratten

Community of Residence: Fairbanks

Comment:

Prop 60,61,62,63,65,66,67,68,69,71

More restrictions on Alaskans putting up food should not be considered.

Commercial fishing industry should not have a say in bag limits and regulations on residents. Many of the commercial fishermen are not even residents.

Submitted by: James Brennan

Community of Residence: Sitka Borough

Comment:

I support Proposal 14, which I understand would ban any pelagic trawl which either touches the bottom--even once--or catches king salmon--even once. This is a reasonable compromise from Proposal 16, which would simply ban all pelagic trawling in PWS.

Bottom trawling is already banned in state waters, because the long term harm to benthic habitat done by trawls contacting the bottom is well documented, in Alaska and elsewhere. The Board should not close its eyes to the fact that so-called "pelagic" trawls come in frequent contact with the bottom, 85% of the time by some estimates.

Prohibiting bottom trawling while allowing de facto "pelagic" bottom trawling is rank hypocrisy, a political strategy which has no place in a science-based regulatory system. At stake here are both the PWS fisheries and ecosystem, and Alaska's reputation for sound resource management.

PC78

Submitted by: Anthony Brenner

Community of Residence: Lake Louise

Comment:

Proposal 89. Disagree with upping the limit.

Not a good idea. These fish take a long time to grow.

PC79

Submitted by: Christopher Brewster

Community of Residence: Anchorage

Comment:

I think it's obvious that the majority of residents and users of Alaska have felt the effects of trawling in this state and would like to see our government step in. Let's protect some of our recreational areas where the public frequents and preserve some of this space for future generations. The fact that trawling occurs within PWS is a complete failure and just wrong.

PC80

Submitted by: Bittner Brooks

Community of Residence: Fairbanks North Star Borough

Comment:

I am tied up supporting my family at work however I have read through the proposition's and used my personal lens of the following:

-Alaskans need to be fed first

-Trawlers are destructive to the ecosystem and the money leaves Alaska

-Commercial fishing is second to Alaskans being fed

Submitted by: David Brown

Community of Residence: North pole

Comment:

OPPOSE Proposals 44, 45, 46, 47, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, and 71. I'm SUPPORT Proposals 48, 51, 52, 53, 58, 59 and 70.

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

My name is Ezekiel Brown. I am a lifelong resident of Cordova, AK where I sport, subsistence and Commercial fish. I have run my own boat since 2011 with which I participate in commercial fisheries for PWS salmon seine, Tanner crab, shrimp, Black Cod pot, Halibut longline and tender for the Copper River Gillnet fleet.

Proposal 1,25,26: OPPOSE *Establish subsistence, sport, and personal use fisheries for sablefish in PWS*

The area in which the majority of black cod harvest occurs in prince william sound is relatively small and even with only two commercial fishermen working at the same time communication is key to prevent tangling gear. Putting more fixed gear for personal use and sport in this small area will result in gear loss and added danger to myself and crew dealing with tangled lines. The majority of boats are not equipped to set pots in 2000+ feet of water. I use 2700' of buoy line and two 30-50 lb anchors on each end of my pot strings as well as weights between the pots. I struggle to imagine where an average sport boat will find space or hydraulic power to fish so deep. I have heard from sport fishermen that they are having good success targeting black cod with electric reels which seems much more attainable than pot fishing.

Proposal 2: SUPPORT *Reopen waters closed to pot gear harvest of groundfish*

I fish Halibut and black cod in Prince William sound with hooks and pots. This closure area forces me to use hooks when fishing in the closed area of the sound. I understand that the reason for this closure is to limit incidental catch of Crab. This makes no sense to me as I have very rarely caught crab in my groundfish pots and when I do they are returned to the water unharmed. However, I do notice much less rockfish harvest when using pots vs hooks.

Proposal 3: SUPPORT *Modify Prince William Sound groundfish pot specifications*

While participating in the PWS Black Cod pot fishery I often catch halibut in my pots however most of them are under the legal size limit. I imagine a larger tunnel eye may allow me to catch more halibut of legal size in my pots. The more halibut I can catch in pots the less hooks I need to set to catch my quota. Catching halibuts in pots would have the added benefit of reducing whale depredation and lowering rockfish bycatch vs using hooks.

Proposal 5: OPPOSE *Adopt a provision to close waters to specific groundfish gear types*

I have serious concerns that the department will use this authority to push small boat halibut fishermen into the outside waters of Prince William Sound particularly towards the end of the season when the weather is the worst. This is exactly what they did when given this authority last year. There are many proposals in front of you that would help limit rockfish harvest that are preferable to this blanket closure ability. The department currently does not enforce the rockfish management plan in regulation, allowing people to exceed the 3000lb trip limit without repercussion. I believe the department needs to use the tools at its disposal before asking for more authority.

Proposal 6: SUPPORT *Allow for release of rockfish in fisheries*

I would like to see this proposal expanded to allow for use of deep water releases in pot and longline fisheries as well. Often while longlining when fishing is slow it would not be hard for a deckhand to return rockfish to the water using a deepwater release.

Proposal 7: OPPOSE *Establish gear specifications for directed lingcod fisheries*

When longlining for halibut in PWS I often catch lingcod. I get a lingcod permit and then I can retain and sell the lingcod I catch while halibut fishing. I have no interest in purchasing jig or troll equipment so this proposal would exclude me from the lingcod fishery.

Proposal 8: SUPPORT *Modify the Prince William Sound pacific cod fishery ghl*

There seems to be a large population of cod in PWS. I catch a lot of them when I am out fishing for halibut. The winter cod fishery is an important fishery economically throughout Alaska. With some more quota assigned to it the PWS fishery could support more boats and would provide a much needed winter fishery for myself and others.

Proposal 9,11: SUPPORT *Combine the Pacific cod longline and pot gear allocations*

Having a longline cod fishery open when halibut fishing is closed never made any sense to me. Fishermen go out in January and February and target cod and release a bunch of halibut and then they go back out once the halibut fishery is opened and catch those same halibut again. Pot fishing cod is much less labor intensive and has much lower bycatch of rockfish and halibut. Lightweight collapsible cod pots can be fished off any size boat and will result in a better fishery. Keeping a separate allocation for Jig will allow for small boat new entrants to participate in the fishery.

Proposal 10: SUPPORT *Modify pot limit in the Prince William Sound Pacific cod fishery*

This will help encourage the switch to pots from longlining. The light weight pots can fit on almost any size boat. On my boat I can fit 30 conventional 6'x6' 500lb cod pots or 300+ lightweight slinky pots.

Proposal 13: SUPPORT *Increase bycatch limits for skates*

There are a lot of skates in PWS it would be nice to be able to retain enough of them to develop markets.

Proposal 15: SUPPORT with amendments *Modify bycatch limits in the Prince William Sound pelagic trawl fishery*

Bycatch limits are set as % of catch of target species in part to prevent targeting of the bycatch species. I would not support modification to the bycatch levels without setting species specific bycatch amounts and including language that bycatch can not exceed a set % of pollock aboard the vessel.

Proposal 19,20: SUPPORT *Modify the commercial fishing season for sablefish*

I am a permit holder in the PWS sablefish fishery. The Current management strategy's restrictive season dates and lack of mechanism to allow full utilization of the ghl is costing me and other permit holders with no biological justification. I would like to see the season dates expand earlier in the spring to coincide with the federal halibut fishery. The implantation of a B season would allow those permit holders who continue fishing in the fall months to sweep up unharvested quota. Anything the board can do to encourage fisheries to operate outside of the summer salmon season should be done as it will be a great help to fishermen, processors and communities in need of diversification.

Proposal 21, 22: SUPPORT *Allow the concurrent use of longline gear and pot gear*

The board and the department should be doing everything they can to encourage the adoption of pots in groundfish fisheries. Current regulation prevents the use of pots and hooks at the same time is preventing me from experimenting with pots in the halibut fishery. This regulation is also extremely frustrating when making trips out of a port that is not my homeport. Often when the cordova processors are closed we will deliver to whittier or seaward. Under current regulation if I am going to do a couple trips out of Whittier one for halibut with hooks and one for black cod with pots I have to go back to home port between trips to switch gear. In the federal halibut and sablefish fisheries it is allowed to fish hooks and pots on the same trip. This mismatch is confusing to fishermen and creates enforcement difficulties when boats fishing federal waters with both gear types are transiting state waters.

Proposal 23: SUPPORT *Prohibit the retention of sablefish from state waters*

This regulation was poorly worded when put into place and is causing issues for fishermen I know attempting to follow the rules. It is hidden in the regulation book under PWS sablefish fishery but it impacts federal sablefish and state waters halibut fishermen.

Proposal 27: SUPPORT *Modify rockfish bag and possession limits*

The growth in the charter fishing fleet and their targeting of rockfish is very apparent to anyone who spends time in PWS. Something needs to be done to limit their harvest. I fear this does not go far enough. The commercial fishing fleet has had a GHL set of 150,000lbs of rockfish for decades and has stayed under this harvest limit almost every year. I ask the board to use this proposal to set a hard cap/ GHL for sport fish rockfish and prevent the continued growth of this fishery.

Proposal 28: OPPOSE *Modify the rockfish area, bag and possession limit*

If the board wishes to create outside and inside districts for rockfish the commercial ghl should also be split.

Proposal 29: SUPPORT *Create additional provisions for yelloweye rockfish management*

Rockfish are a limited resource and can not support unlimited fishing pressure. The board should expand this proposal to apply to all sport caught rockfish.

Proposal 31 - SUPPORT Repeal closed waters for the Prince William Sound Tanner crab.

I do not understand why these bays are closed when so many other bays on the west side of the sound are open. Closure areas do not make sense for crab fisheries as the biomass is constantly moving. During the 2022 commercial crab fishery in the eastern district these closure areas severely limited the waters available to fish in even though the department's trawl survey used a healthy population of legal crab inside the closure area to create the biomass estimate.

Proposal 32 - SUPPORT Reopen the Dungeness crab fisheries.

I have seen plenty of evidence of a healthy dungeness crab population in area E. While gillnetting in front of the copper river I have caught many dungeness crab and also while participating in the subsistence and commercial tanner crab fishery. I believe the department and the board have no justification for the continued closure of this fishery and there is very little risk to opening a fishery where only large males can be harvested. Commercial dungeness fisheries occur every year from California to King cove with no surveys. Why continue to close this fishery waiting for a survey the department will never fund?

Proposal 33 - OPPOSE Adopt community-based subsistence harvest permits

A small scale commercial fishery is what this community needs to provide crab for the locals. Dock sales have happened every year there has been a commercial tanner crab fishery and provide crab for the community. Additionally during the 2022 commercial season a boat went out with the sole purpose of bringing crab in to the native elders. Who would be eligible for Community harvest permits?

Proposal 34 - SUPPORT Repeal the Registration Area E Tanner crab harvest strategy.

The tanner crab harvest strategy for area E is unacceptable and will never result in a worthwhile fishery. The area designations are totally without logic in many cases the boundary lines are right in the middle of crab habitat and the crab move back and forth between districts. The reliance on trawl surveys that are unaffordable for the department to carry out and catch ridiculously low numbers of tanner crab that then are extrapolated to produce population estimates. The department is also keeping closed the northwest area where the highest density of crab was found in the test and commissioners permit fisheries. It does not have to be this hard to have a crab fishery in PWS, just open a fishery. If there's not a lot of crab around we won't go crabbing. We had a fishery for three years in part of the area under the commissioners permit and it was working fine until the department decided to enact this overly complex management strategy.

Proposal 35 - SUPPORT harvest strategy for Prince William Sound Tanner crab.

This proposal would result in a small scale tanner crab fishery which is what we need. The Tanner crab fishery in PWS is much more like the southeast exploratory areas or the semidi Island overlap between Kodiak and Chignik. In both of those areas the board of fish and department allow for fisheries despite a lack of surveys or harvest strategies. Pass this proposal and allow a fishery in area E and as it develops we will work with the department to refine harvest strategy and GHLS.

Proposal 36 - SUPPORT Increase the pot limit in the Tanner crab fishery.

I do not remember when this pot limit was reduced and am sure I did not have an opportunity to comment on it. This small pot limit has been extremely frustrating when attempting to prospect

PWS forcing at times to space pots .5-1 mile apart. It is easy to miss the biomass of tanner crab when prospecting, sometimes 100 yards makes a huge difference in catch rates. I have also participated in the Kodiak fishery with a 20 pot limit and I understand the reasoning for that pot limit over there where there are 100+ participants and the crab are extremely condensed. This is not the case in PWS. Often in PWS I see maybe one other crab boat fishing near me and the crab are very spread out over large areas. The small pot limit makes the only option to try to cover the area running the pots twice a day. This results in less soak time and does not give the female and undersized crab a chance to escape causing increased handling. It also increases bait and fuel usage. This arbitrarily low pot limit is a lose-lose for the fishermen and the resource. With the daily reporting requirement already in regulation there is no risk of too rapid of harvest rate in this fishery.

Proposal 37 - SUPPORT *Establish a static pot limit in the Tanner crab fishery.*

Adjusting pot limits on a year to year basis makes planning very difficult. Tanner pots are expensive and built in matching sets same with all the line and buoy setups. I have no idea how many pots I should have ready if this fishery is to open until right before the season and it is doubtful I'll have time to find matching pots that safely fit my boat. I would err on the side of just owning the maximum allowed in regulation except adfg might never allow that and I'll just have thousands of dollars worth of gear to store. Additionally this regulation seems to infer that pot limits should be lowered if the GHL is low which is ridiculous. If the GHL is low that would be because there is a low abundance of crab so you would have a corresponding low catch rate per pot. Adjusting the pot limit on a season by season basis is just another example of a poor management practice in PWS that do not exist anywhere else in the state.

Proposal 38 - SUPPORT *Allow vessels in the PWS Tanner crab fishery to also tender.*

This would be very helpful to get the crab to markets. During the 2020 crab season the only market was in Seward which required a long run through the gulf of Alaska. This is dangerous and difficult for smaller boats to have to leave the protected waters of PWS. With the further consolidation of processors across the state I would not be surprised if in future years crab will need to be taken to Kodiak or further for processing. Allowances for fishing boats to also act as tenders are available in every salmon fishery in the state under the transporter section of regulation as well as in the Kodiak dungeness fishery.

Proposal 39,40 - SUPPORT *Establish a commercial Golden King crab fishery.*

There is a commercially viable population of Golden king crab in PWS. During the tanner crab test fisheries and commissioners permit fishery I caught golden king crab in the deep waters of western PWS. Golden king crab tend to live much deeper than tanner crab so seeing the amount I did while tanner crab fishing makes me believe there is a healthy population.

Proposal 42 - OPPOSE *Open a sport king crab fishery*

Crab should not be fished during the summer months when molting

Proposal 43 - SUPPORT *Establish a directed octopus fishery in Prince William Sound.*

I would like to participate in this fishery. There is a market at the very least locally for octopus.

Proposal 46, 47 - SUPPORT *Require harvest reporting within seven days of harvest*

I participate in the lower river subsistence fishery almost every year. Having to report weekly would not be difficult and would increase the accuracy of reports.

Proposal 48 - OPPOSE *Repeal the prohibition of subsistence guide services*

The board had sound reasoning when it passed this prohibition just three years ago.

Proposal 49 - SUPPORT *Prohibit transport services in the Glennallen Subdistrict.*

This seems like a loophole that should be closed.

Proposals 51, 52, 53 - OPPOSE *Reduce commercial salmon fishing opportunity.*

Anyone who has been involved in wild salmon fisheries knows that there is no average run and attempting to force management to manage every year as if there is is bound to fail. Being the first salmon run of the year the copper river salmon run timing is based on when spring finally comes and the river ice breaks; this varies wildly every year and is the primary reason managing to the run timing curve is hopeless. Attempting to force fish to follow a calendar will not work and we can only expect further departures from historic run timing and distribution as the environment continues to change. If these proposals pass they will have an immediate impact on my livelihood and will not result in healthier runs of salmon.

Proposal 55 - SUPPORT *Restrict commercial guide services in the Upper Copper River*

Proposal 58, 59 - OPPOSE *Amend the Copper River Salmon Management Plan*

The Copper river salmon run is fully allocated.

Proposal 60, 61, 62, 64, 65, 66, 67, 68, 69, 71, 72 - SUPPORT

The board needs to act to put some guardrails on this ever expanding inriver fishery.

Proposals 73, 74 -OPPOSE *-Permit stacking by single salmon purse seine permit holder*

I was one of the proposers of the original permit stacking proposal that passed in 2021. Part of the reasoning behind that proposal was to provide another entry path into the fishery for crew members who could buy a permit and lease it to the captain of the boat they are fishing on as the second permit holder. If these proposals pass and a captain is allowed to just buy his own second permit that pathway for new entrants will get more difficult. The permit stacking regulation on books has only been in place for 3 seasons and already over 10% of the boats are fishing dual permits. Let the current regulation go for a few more years unchanged and if more consolidation is needed then we could talk about a proposal such as this.

Proposals 75, 76, 77 - OPPOSE *Amend the Salmon Enhancement Allocation Plan*

The current salmon allocation plan has been in place my entire adult life. I have built my business and life based on this regulation. There is no reason to change it.

Proposal 78 - OPPOSE *Reduce hatchery permitted pink salmon egg take level by 25%.*

The hatchery system in Prince William sound is one of our greatest achievements in food production. For going on 50 years these hatcheries have increased the salmon runs creating billions of lbs of food and an entire economy that would not exist without them.

Those opposed to the hatchery system will often point to cycles attributed to the large odd year pink salmon returns. Any even/odd year cycle can not be attributed to hatcheries as they release the same number of fry every year.

In the last decade i've seen record returns of both wild and hatchery salmon to Prince William Sound which have allowed me to buy my own boat and start a family. If the board chooses to adopt a reduction in the egg take goal it will have an immediate impact on my livelihood and will impact my ability to continue to be a commercial fisherman and live in Alaska.

Proposals 79,80,81 - Support Close Main Bay during hatchery cost recovery operations

Something needs to be done to address fishing in the head of main bay during cost recovery efforts. It should not be controversial to ensure adequate space for the hatchery to achieve its brood stock and cost recovery goals. There are plenty of areas around main bay that have large build ups of sockeye that subsistence, sport, and commercial fishermen can and do target that do not interfere with hatchery operations.

Proposal 83 - OPPOSE Allow a resident sport angler to use two rods when fishing

Proposal 84 - SUPPORT Prohibit charter operators from retaining kings and rockfish

This is a loophole that is used to allow clients to harvest additional fish while on a charter and should be closed.

Proposals 86,87,88 - Support Modify sport coho salmon fishery

Growing up in Cordova it seems like every year there is more and more sport fishing effort on the delta targeting coho and it continues on later into the year past when new fish are still entering the rivers. Closing fishing in some spawning beds after September 21st is a logical protection to put into place. Oftentimes these fish are already counted by the department as escapement and yet do not get to spawn as they are caught by sport fishermen.

Proposals 96,97,98,99,100,102 - Support Modify PWS Herring Management

Modifying the PWS herring fishery management to align with the numerous changes over the last 30 years in PWS herring population size, location and markets available is very much needed.

Franke L Brown
Vanguard Fisheries
[REDACTED]
Kodiak, AK. 99615

November 26, 2024

Re: **Oppose Proposals 14, 15, 16 & 17** — PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Franke Brown, owner of the Fishing Vessel *Vanguard* based out of Kodiak, Alaska. I have been part of this vessel's journey since 1990, serving as a crew member, captain, and now owner, for over 34 years.

I have been a proud resident of Kodiak since 1987, where I raised five children. The *Vanguard* is owned in partnership with individuals who, like me, have deep ties to Alaska through family and community. Our vessel directly employs eight fishermen, most of whom are Alaska residents, along with their families. Beyond our crew, the *Vanguard* supports hundreds of jobs in Kodiak through the services it requires.

The *Vanguard* is a 90-foot trawler that serves the communities of Kodiak and Dutch Harbor. In the past, it supported a pollock buying plant in Seward through the Prince William Sound pollock fishery, and it has the potential to support establishing a new local plant in the future.

For nearly 30 years, we have participated in the Prince William Sound fishery. My experience is the fishery is a carefully managed operation, conducted at a slow pace with observers provided by the state, when they have the resources to deploy them. No more than 6–8 vessels operate in the Sound at any given time, and strict reporting requirements are in place. My experience has shown this fishery to be well-regulated, requiring effective management tools to participate.

This fishery plays a crucial role in creating opportunities for our crew, processing facilities, and communities. The seafood industry is facing significant challenges, and small vessels like mine are struggling. Losing this fishery would be devastating to my operation, which has taken over three decades to build.

Opposition to Proposals 14, 15, 16, and 17

I strongly oppose Proposals 14, 15, 16, and 17. Proposals 14 and 16 aim to close the fishery entirely, while Proposals 15 and 17 would modify bycatch limits and change monitoring requirements.

The Alaska Department of Fish and Game (ADF&G) staff also oppose these proposals, stating they have the necessary management authority to ensure sustainable fisheries.

Bycatch:

The ADF&G has Emergency Order (EO) authority to adjust bycatch limits. This fishery operates under strict bycatch caps:

- Bycatch is limited to no more than 5% of the total round weight of pollock harvested.
- Rockfish bycatch is capped at 0.5%, and salmon at 0.04%.

Between 2021 and 2023, the average bycatch consisted of 759 rockfish and 888 salmon annually, compared to an average pollock harvest of 6 million pounds.

Monitoring:

ADF&G has the authority to deploy observers, and my vessel complies with rigorous monitoring requirements. We participate in the federal Electronic Monitoring (EM) Program, where cameras operate continuously, and we are accustomed to being heavily monitored.

Sustainable Practices:

We use advanced trawl nets specifically designed to target pollock while minimizing bycatch. Tools such as salmon and small-fish excluders, developed through 30 years of experience, ensure sustainable practices. Our operations are mid-water trawling, meaning our nets do not touch the ocean floor, reducing environmental impact.

Ecosystem Impact:

Ending the Prince William Sound pollock fishery could disrupt the ecosystem by increasing predation on salmon and herring fry. I have witnessed this in other regions where trawlers were removed, leading to the collapse of fisheries due to unchecked predation. While this observation is anecdotal, it highlights potential unintended consequences.

Conclusion

This fishery is a cornerstone that supports crews, cannery workers, families, communities, and the State of Alaska. I urge you to reflect deeply on the purpose of these proposals and their potential impact. Are we here to sustain and support responsible fisheries and hardworking fishermen, or to jeopardize their livelihoods? The *Vanguard* and other trawlers play a critical role in Alaska's seafood industry and deserve to have those contributions recognized as vital in many ways. Let us take this opportunity to consider what we want to create moving forward. What brought us to this table, and how can we foster a solution that benefits all stakeholders involved?

Thank you for the opportunity to comment.

Sincerely,

Franke L Brown

Submitted by: Franke Brown

Community of Residence: Kodiak

Comment:

14, 15, 16, 17

Submitted by: Josiah Brown

Community of Residence: Cooper Landing

Comment:

14-17

Supporter

We have watched other fisheries get destroyed with people doing nothing to stop it. We still have a chance to save Alaska fisheries from being destroyed by trawlers.

My name is Loretta Brown and I reside in Homer. I am writing to you today to express my support for a Proposals 14, 15, 16, and 17 regarding the Prince William Sound pollock pelagic trawl fishery.

I urge you to pass Proposals 14-17, which would alter the management of the PWS pollock pelagic trawl fishery. Trawling is an indiscriminate method of fishing, which hauls huge nets through the water and often scraps the ocean floor. While fishing, these nets catch everything in their path, whether it's the target fish or not. On average, 1,035 rockfish, 389 Chinook salmon, 76,000 pounds of squid, 2,214 pounds of shark, and 10,499 pounds of other species are bycaught annually.

Under Alaska regulations, pelagic trawl nets are not allowed to contact the seabed. Regulations read: "a pelagic trawl is a trawl where the net, or the trawl doors or other trawl-spreading device, do not operate in contact with the seabed." However, the PWS pollock pelagic trawler's bycatch indicates these nets are, in fact, dragging the seabed. Annually, 902 Shortraker rockfish and 133 Rougheye rockfish, both demersal or bottom-dwelling rockfish species, are caught. Additionally, other bottom-dwelling species brought in by the trawlers include: halibut, black cod, lumpsuckers, skates, sole, flounder, octopus, prongfish, and other rockfish species. This bycatch and the dragging of seabed from trawl nets is unacceptable destruction of the highly productive ecosystem of PWS that supports a multitude of commercial, sport, and subsistence fishing as well as robust residential and migratory marine biodiversity.

In the PWS trawl fishery, the fishers self-report their bycatch. There are currently no observers on-board the vessels while fishing, and the catch is offloaded at a processor in Kodiak, a trip of over 200 nautical miles. This lack of direct oversight begs the question of the accuracy of bycatch numbers and is a regulatory loophole that needs to be closed.

Climate change and changing ocean conditions are taking a toll on Alaska's ocean and freshwater species and habitat. Salmon species such as chinook salmon have been hit particularly hard, and we have seen declines throughout the state. Chinook salmon runs in PWS are not immune from declining populations. In fact, this June, ADF&G closed the Upper Copper River and its tributaries for both sport and subsistence fishing of Chinook Salmon. At that time, it was clear that the Copper River would not meet the lower bounds of the management escapement goals (21,000-31,000) and the king salmon passage on 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 station. Every Chinook salmon that returns to the Copper River drainage is one more spawning salmon that can help recover this vital run. However, each salmon caught as bycatch in the pollock fishery in PWS is one less that has that chance. Each salmon counts.

I strongly urge you pass the proposals 14-17, and update the management of the pollock pelagic trawl fishery in a manner that protects the PWS ecosystem and local communities from the destructive impacts of trawl fishing. Thank you again for your time and consideration of these proposals. I will be in attendance at the Board of Fisheries meeting in December in Cordova and look forward to further discussion regarding these Proposals

Sincerely,
Loretta Brown

Submitted by: Kevin Brown

Community of Residence: Fairbanks

Comment:

Life long Alaskan That depends on hunting and fishing to provide food for my family.

I believe any infringement on Alaskans to provide food for their family is against what we stand for as Alaskans and should be taken seriously. The fish and game want to impose rules on struggling family's and villages on how we feed our family's while not giving one thought into commercial fisheries raping the seas with enormous bycatch and doing nothing about it all you see is money from big corporations. Quit restricting Alaskans from providing for their family's. Alaskans first outside demand second

Submitted by: Mike Bugni

Community of Residence: Valdez

Comment:

I rely solely on the Copper River dipnet fishery to supply my family with sockeye salmon.

Submitted by: Conley Bunde

Community of Residence: Anchorage

Comment:

These are poorly thought out attempts by a small group to limit the majority of Alaskans access to our shared salmon resources.

Submitted by: William Burke

Community of Residence: Palmer

Comment:

I support proposal #16. Utilizing bottom or mid-water trawl gear that may come in contact with the sea floor has been proven to be a very destructive on sea floor habitat. Also using a 5% bycatch by total weight of harvest and established caps reduces other non-target species significantly and is essentially wonton waste. Given potential rock fish and king salmon declines this fishery should not be allowed to continue as I believe it is not sustainable.

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

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Simon Burn and I am one of the captains of the F/V Bay Islander, which is an 88-foot, family owned and operated trawl vessel. I have been immensely grateful to have fished the waters of Alaska in multiple fisheries for forty years, including PWS pollock for the last twenty years. Being a fisherman is the only thing I have ever known, and it's not just a job for me, it is my way of life. My earliest memories as a child are of being on the ocean with my father, who was also a commercial fisherman.

After years of working on deck, when I became a mate and was learning to tow, my good friend and mentor taught me that besides safety, fishing clean was the most important thing I needed to do. When I am at the wheel, my mind is constantly churning with weather, tides, pollock catch rates, where there might be salmon or too many rockfish, all of the tradeoffs that help me decide where the cleanest, safest, most efficient place to fish is. My fellow fishermen and I are constantly checking in and sharing information to make sure we are staying clean while we fill the boat.

In the four decades that I have been on the water, I have only seen trawl fisheries get better, cleaner, and more efficient. I do not understand the negativity and hurtful words spoken about trawl fisheries, because it is not our lived experience; my fellow fishermen and I take great pride in what we do to provide for our families and feed the world healthy, affordable fish.

It is my understanding that the State has the authority to deploy observers at any time when boats are fishing in PWS pollock. While they don't usually do that, sometimes we end up carrying an observer anyway if we aren't sure whether we'll fish in the

federal fishery in Middleton or in PWS. We aren't afraid of monitoring and have nothing to hide. When we are doing EM for pelagic pollock we have cameras on 100% of our trips. As trawl fishermen, we know that good data is important for managing our fisheries; the Bay Islander is even a pilot vessel to help build a new EM program for CGOA rockfish. We want to preserve our fisheries for future generations.

Making the long trip from Kodiak to PWS is worth it because we find large schools of clean pollock there in January and early February while we wait for pollock to aggregate to spawn in the Shelikof. It's often the first paycheck of the year for myself and my crew, which is important for each of our wives and families back at home, especially now as we are about to start our second full year of rock bottom prices and market issues. Everyone in Alaska's fisheries are hurting right now, and we need to keep as many opportunities available for everyone as we can. Making changes to PWS pollock will only make the situation worse.

I strongly oppose Proposals 14, 15, 16, and 17. Thank you for the opportunity to comment.

Sincerely,



Simon Burn
F/V Bay Islander

Submitted by: Jeffrey Burrell

Community of Residence: Fairbanks

Comment:

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

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

James R. Burton
F/V Cricket
PO Box 41
Cordova, Alaska 99574

November 23rd, 2024

Marit Carlson-Van Dort
Alaska Board of Fisheries
PO Box 115826
Juneau, AK 99811-5526

RE: Public Comments for Prince William Sound / Copper River Proposals

Dear Madam Chair and Board of Fisheries Members, I am a third generation Fisherman from Cordova, Alaska. I have fished for herring, salmon, crab and ground fish from Southeast Alaska to the Bering Sea for the majority of my life. I have been a sport and subsistence user for fish and game resources in Alaska for all of my life. I have served as a Fish and Wildlife Aide and an Alaska State Trooper in the Division of Fish and Wildlife Protection with duty stations in Kodiak, Fairbanks, Sitka and Anchorage. I served the community of Cordova, seated for two terms on Cordova City Council in addition to other various roles including the Harbor Commission and Health Services Board. I hold permits for herring seine and gillnet fisheries in Southeast Alaska and Prince William Sound, salmon seine and gillnet permits in PWS, and sablefish quota. I have a vested interest in the proposals before you.

I am married and the father of four children. My oldest daughter has fished with me for 7 years as a full time crewman, and participates in the multiple fisheries. She is a 4th generation fisherman, recently completing her first drift gillnet season as a permit holder and vessel owner. Commercial Fishing is critical to my family, not only as income, but a skill and tradition to be passed down. The idea that the commercial fishing industry would be willing to sacrifice the future of our fisheries for a fish ticket today couldn't be further from the truth. We are not only fishermen, but stewards of the resource with the goal to pass this industry down to the next generation. I have every intention to introduce the rest of my children to this life in hopes that they will someday have an opportunity to feed the world. That opportunity relies on sound decisions by you, the Alaska Board of Fisheries, today and in the future.

I will start my written public comments with a run down of proposal numbers and a simple statement of opposition or support followed by my arguments. If the proposal is not enumerated in this letter, I am neutral.

Proposal 2: Support.

Proposal 4: Oppose.

Proposal 6: Support

Proposal 7: Oppose

Proposal 9: Support

Proposal 11: Support

Proposal 12: Oppose

Proposal 14: Oppose - As a salmon fisherman, I am vehemently opposed to shutting down the pollock trawl fishery in PWS. This fishery, if anything, should see a doubled quota. Pollock are a natural predator for salmon in both the fry and juvenile stages. As we consider ocean survival rates between different stocks, whether wild, hatchery, or species differentiated, one thing we know for certain is predator stocks are on the rise. Rising quotas under the North Pacific Fisheries Management Council in areas 610-630 are indicative of this. Pollock are only one species in that group of predators - and one that has both an economic benefit in the directed fishery for those fisherman, and an indirect benefit for over a thousand salmon fishermen and crew in PWS.

Proposal 15: Oppose due to vagueness. There's nothing saying ADF&G can't just revert to 5% which makes the entire proposal moot.

Proposal 16: Oppose - see reasoning for 14.

Proposal 17: Oppose

Proposal 18: Support with modification. Mirror the federal season closure dates to take advantage of a longer season and fresh markets. Why should the State fishery end in August, or October, when the federal IFQ season ends (this year) December 7th?

Proposal 21: Support

Proposal 22: Support

Proposal 32: Support

Proposal 38: Oppose

Proposal 42: Oppose

Proposal 44-47: Support

Proposal 48: Oppose - I would argue that guides and transporters are not customary and traditional for subsistence fishing.

Proposal 49: Support

Proposal 50: Support - This would mirror federal regulation

Proposal 51-53: Oppose - ADF&G has done the best they can at managing for escapement when there's a 7-10 day lag in sonar data. We've sent more fish upriver every year, for years, than required for escapement and upriver users. These proposals would exacerbate the issue dramatically.

Proposal 54: Support

Proposal 55: Support

Proposal 56 and 57: Support - permit stacking is a great tool to allow a commercial fleet the ability to perform several functions. 1) It provides an apprentice type of scenario where a crewman or permit holder without a boat can either purchase or receive an EMT permit. This function allows a person to learn the fishery without getting thrown to the wolves - especially on the Copper River Flats which are notoriously dangerous. 2) It allows the industry to essentially perform a buyback without the use of State or Federal funds as has been done in other fisheries. 3) It stabilizes permit values at a time where we're watching values of both fish and permits struggle. 4) It is unique in its ability to benefit those who don't want to participate in owning or operating a second permit. Reducing congestion in these fisheries is critical because CFEC, in all of its greatness, designed limited entry for an entirely different era. Today's fishery is nothing like the 1970's.

A common argument I have heard opposing stacking proposals have been that they don't want to have to buy a second permit to compete - I agree that it is an added expense. However, the additional length of gear will eventually provide a full return on the investment and secondly, even those who don't choose to make the leap will benefit by an overall reduction of gear in the water.

The second most common argument that is brought up, is increasing permit values and creating a barrier to entry. First of all, stabilizing permit values is a stated goal of the proposal. Secondly, there is no larger driver of permit value than the value of the fishery. If you can't make money in the fishery, the permit value reflects it. We can look back to 2014/15 and see time weighted permit values exceeding \$300,000 in the S03E fishery compared to \$74,900 for last month (10/24). See the table in this link https://cfec.state.ak.us/pmtvalue/X_S03E.HTM. I can name a number of younger generation fishermen who bought S03E permits in excess of \$200,000 who were just starting out, refuting the barrier to entry argument.

Proposal 58 - Oppose. If we exceed escapement on king salmon, let's build a larger run for all user groups. After all, by the time there are "extra" king salmon, the commercial fleet has usually been punished by reduced time and area - and it rewards upriver groups for that sacrifice. If there's a shared burden of conservation, leave those kings in excess of 31,000 to hopefully increase the size of the run in future years so every user group can benefit.

Proposal 60 Support

Proposal 61 Support

Proposal 62 Support

Proposal 64 Support

Proposal 65 Support

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Proposals 66 - 69 Support

Proposal 70 Oppose

Proposal 71 Support - I believe this is already prohibited federally as I testified to during the 2009 or 2010 BOF meetings but I may be mistaken. I will try to find that regulation before committee of the whole.

Proposal 72 Support

Proposals 73 & 74 - Support. I am the author of proposal 73. I used the language from the BOF's recent stacking proposal passage for Cook Inlet and modified it to fit the PWS seine fishery. If it pleases the board we can work on substitute language for 73 or 74 to satisfy what we are attempting to do. Please refer to my comments for 56 and 57 for an overall belief in supporting industry-led stacking initiatives.

Additionally, we've already seen the effect of stacking seine permits in PWS but I believe we've reached the saturation point under current regulations. In order to further reduce congestion in this fishery, we need additional regulatory tools. According to the 2024 ADF&G post season summary, there are approximately 28 dual permit vessels.

Time weighted values found here: https://cfec.state.ak.us/pmtvalue/X_S01E.HTM show that we are relatively flat with permit values before the first stacking proposals were passed in 2021. We did see an uptick in values short term, however as I alluded to in my 56/57 comments - the value of the permit is more closely tied to the value of the fishery rather than the scarcity of the permits. In fact, looking at time weighted values, the value of a PWS seine permit was higher for the entire decade (and longer) preceding the 2021 stacking proposal passage.

As salmon processors continue to fail or withdraw, it's becoming evident that our industry is in challenging if not dire times. Consolidation, is unfortunately what appears to be a survival mechanism for all of us. Look at Trident Seafoods downsizing or complete regional withdrawals, the bankruptcy of Peter Pan Seafoods, bankruptcy of Whittier Seafoods, OBI Seafoods latest news, etc.

I operate one of the 28 dual permit vessels; there is no allure to buying another if this passes, but I want to see more fishermen make this move. Short of abusing the CFEC transfer process,

many people struggle to find a crew member with a second permit. Loosening the regulation is the only tool we have left in this toolbox.

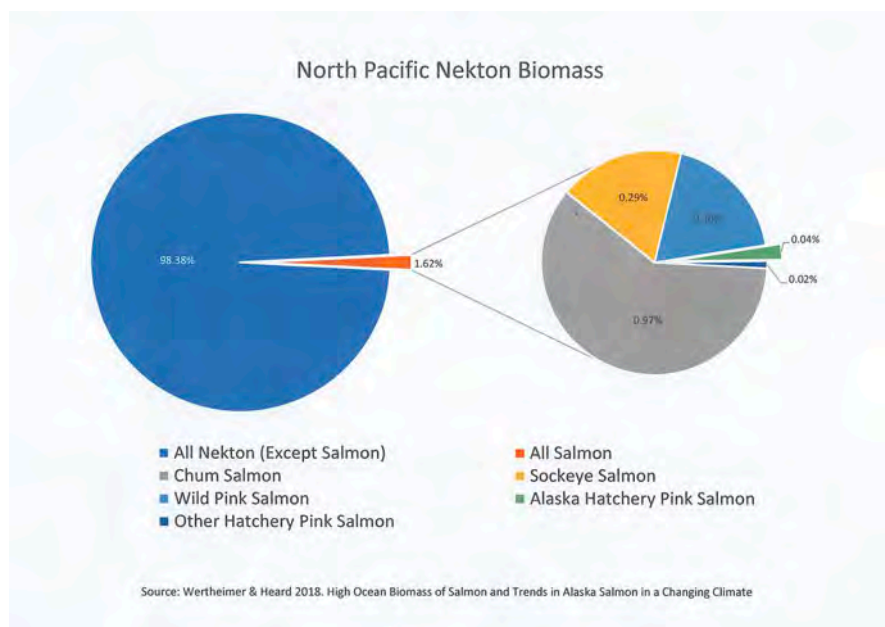
Proposal 75-77: Oppose. I am a permit holder for both the drift gillnet fishery and seine fishery. There's no reason to change the allocation plan at this point.

Proposal 78. Oppose.

This is the same proposal the author has submitted either under their own name or others for several cycles. **I urge you to reject Proposal 78 and all similarly worded proposals** and offer the following personal comments -

Even if the Board of Fisheries has the authority to alter or regulate egg take numbers, it circumvents a larger process by which these numbers are arrived at - utilizing the best available science. Why would it be appropriate to remove the role of egg take permitting from scientist with the Alaska Department of Fish and Game and politicize it through the Board?

Proposal 78 suggests that there is an ocean carrying capacity issue exacerbated by hatchery-produced salmon. If this is true, I ask how have we seen - in the last ten years - some of the largest sockeye and pink salmon returns (sometimes simultaneously) in Alaska? How do we explain the last handful of record-breaking Bristol Bay returns that occurred at the same time that North Pacific aquaculture productions were at their current and probably record levels if you consider Russia and Asian hatchery production? The answer is you can't. Please see the following chart which was previously introduced as RC070.



Continuing that thought, Russia produces pink salmon at a rate that is greater than 2:1 compared to Alaska. It's unclear what the split is between wild production and hatchery, but the information I have suggests it's at least 50% hatchery production. What number of eggs that takes and

how many fry are released into the North Pacific Ocean I don't think we'll ever know. Which brings me to my next question for the Board:

Why is the onus placed on Alaska hatcheries to bear the entire burden of the North Pacific? Salmon fry released into the ocean is in the *billions* yet this proposal takes zero consideration into the fact that this is a multinational industry, of which the State of Alaska is honestly *at least* a very distant second - to other countries over which the BOF has no control or jurisdiction.

Here's a link to a recent article in National Fisherman: <https://www.nationalfisherman.com/scientists-warn-pink-salmon-boom-threatens-other-species>

ADF&G's very own chief fisheries scientist Dr. Bill Templin is quoted in the article saying: *"While hatchery pinks may make up 10 percent of the adult pink, chum, and sockeye stocks in the North Pacific, that doesn't take into account the abundance of all the immatures and juveniles. If you add those to the numbers, the percentage of hatchery pinks becomes so small that it's not clear to me how reducing production will have any effect at all."*

Just as Dr. Templin referred to in the article I do not see any evidence presented in Proposal 78 to effectively quantify what benefit wild salmon would see, given a significant reduction in hatchery salmon. The lack of quantifiable, defensible data is arguably the biggest concern with this proposal when considering the economic fallout it will no doubt induce.

In furtherance of my argument, here is an excerpt from Steve Reifentstahl's PC174 from the spring 2024 board meetings:

To speak to the attack on pink salmon hatcheries based on papers such as the Ruggerone et al (2023) review, we need some basic understanding of the scale of pink salmon biomass in relation to North Pacific food webs, and how much hatchery pink salmon contribute to this biomass. The correlation leap is quickly made in the Ruggerone and McMillan papers that high abundance of pink salmon somehow equates to hatchery impacts because hundreds of millions of hatchery fish are released into the ocean. First and foremost, hatchery pink salmon (all Pacific Rim countries) make up only 15% on average of the pink salmon in the North Pacific Ocean; any impacts of pink salmon on oceanic food webs are predominately driven by wild pinks and other salmonids. Second, while pink salmon are typically the most abundant salmon in terms of numbers of adults each year, they make up only 22% of the total wild and hatchery biomass of salmon in the ocean, all countries combined. Chum salmon and sockeye salmon, which have multiple year classes, make up 60% and 18% respectively of oceanic salmon biomass. Third, while there are billions of salmon entering the North Pacific to rear and compete for food resources, there are trillions of other zooplanktivores such as herring, walleye pollack, cod, myctophids, and Japanese pilchards. Salmon have been estimated to make up 4-7% of the biomass of nekton feeding on zooplankton in the North Pacific. Pink salmon would thus compose 1-2% of this biomass, and hatchery pink salmon < 0.5%. The speculation that this small amount of biomass is causing the basin scale effects proposed by Ruggerone et al. (2023) is truly a case of the tail wagging the dog.

Proposals 79-81 SUPPORT

Proposals 86-88 SUPPORT

Proposal 95 - Oppose as written. I am not in favor of reducing the spawning biomass threshold; unless this is removed I cannot support this proposal.

Proposal 97 - Oppose - same as 95.

Proposal 101 - Support

Proposal 102 - Oppose as written. I think there are good intentions with this regulation but the proposal language could use some additional work.

Proposal 103 - Support in part. I support the stacking initiative like I do all others. However knowing how many tons can be caught in a 200 fathom long, 1700 mesh deep herring seine, I have to oppose the depth increase. Shoal Point 2008 yielded multiple sets using deep seines in shallow water and a 10,000 ton opening take. PWS does not have the available quota to increased seine depths without risking over harvest. I would support the proposal if the language only increased the seine length.

I will attached pdf copies of the links I referred to in this letter as attachments.

Thank you for your time and dedication to this process.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Burton", with a stylized, cursive script.

James R. Burton

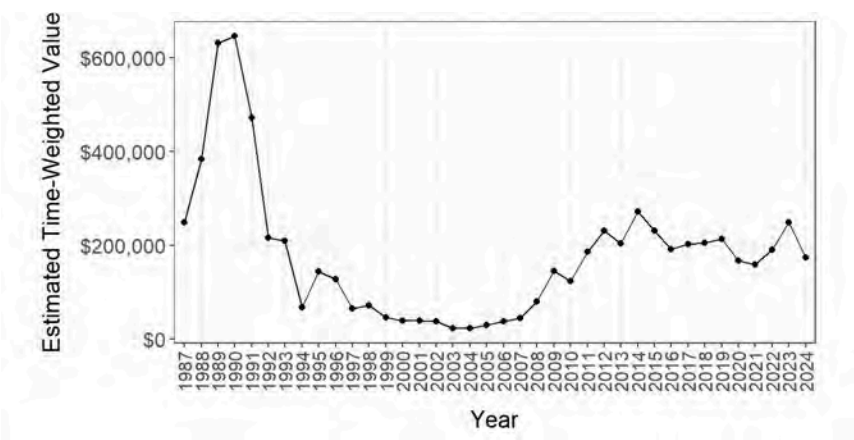
Alaska Commercial Fisheries Entry Commission

Estimated Permit Value Report

(S01E) Salmon, Purse Seine, Prince William Sound

Click here (<https://www.cfec.state.ak.us/pmtvalue/RPTDESC.html>) for an explanation of this report. All values are given in 2024 dollars. To download data as a CSV file, click here (https://www.cfec.state.ak.us/pmtvalue/permit_value_data.csv). For pre-1987 data, click here (https://www.cfec.state.ak.us/pmtvalue/pre1987_main.html).

Estimated time-weighted permit value in June of each year



Historical estimated permit values

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2024	Mean	\$172,500	\$22,700	\$172,500	Mar 2024	Jul 2024
2024	Oct	\$165,000	\$22,900	\$165,000	Apr 2024	Jul 2024
2024	Sep	\$165,000	\$22,900	\$165,000	Apr 2024	Jul 2024
2024	Aug	\$165,000	\$22,900	\$165,000	Apr 2024	Jul 2024
2024	Jul	\$165,000	\$22,900	\$165,000	Apr 2024	Jul 2024
2024	Jun	\$173,800	\$17,800	\$173,800	Apr 2024	Jun 2024
2024	May	\$194,900	\$38,800	\$194,900	May 2023	Apr 2024
2024	Apr	\$194,900	\$38,800	\$194,900	May 2023	Apr 2024

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2024	Mar	\$238,400	\$22,300	\$238,400	Apr 2023	Mar 2024
2024	Feb	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2024	Jan	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Mean	\$247,400	\$3,700	\$247,400	Feb 2023	May 2023
2023	Dec	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Nov	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Oct	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Sep	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Aug	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Jul	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Jun	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	May	\$249,600	\$3,600	\$249,600	Apr 2023	May 2023
2023	Apr	\$246,200	\$2,400	\$246,200	Feb 2023	Apr 2023
2023	Mar	\$247,000	\$4,400	\$247,000	Nov 2022	Feb 2023
2023	Feb	\$247,000	\$4,400	\$247,000	Nov 2022	Feb 2023
2023	Jan	\$236,000	\$29,600	\$236,000	Sep 2022	Nov 2022
2022	Mean	\$202,000	\$30,100	\$202,000	Jan 2022	Nov 2022
2022	Dec	\$236,000	\$29,600	\$236,000	Sep 2022	Nov 2022
2022	Nov	\$236,000	\$29,600	\$236,000	Sep 2022	Nov 2022
2022	Oct	\$253,500	\$5,200	\$253,500	Aug 2022	Sep 2022
2022	Sep	\$248,400	\$12,400	\$248,400	Jul 2022	Sep 2022
2022	Aug	\$213,100	\$28,700	\$213,100	May 2022	Aug 2022
2022	Jul	\$197,400	\$18,300	\$197,400	May 2022	Jul 2022
2022	Jun	\$190,600	\$15,300	\$190,600	Apr 2022	Jun 2022
2022	May	\$182,100	\$9,100	\$182,100	Mar 2022	May 2022
2022	Apr	\$190,900	\$13,300	\$190,900	Feb 2022	Apr 2022
2022	Mar	\$185,900	\$22,100	\$185,900	Jan 2022	Mar 2022
2022	Feb	\$185,800	\$24,200	\$185,800	Nov 2021	Feb 2022
2022	Jan	\$179,200	\$23,700	\$179,200	Nov 2021	Jan 2022
2021	Mean	\$171,900	\$20,200	\$171,900	Feb 2021	Dec 2021

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2021	Dec	\$186,700	\$21,300	\$186,700	Oct 2021	Dec 2021
2021	Nov	\$176,800	\$15,200	\$176,800	Aug 2021	Nov 2021
2021	Oct	\$165,400	\$14,100	\$165,400	Jun 2021	Oct 2021
2021	Sep	\$158,200	\$3,700	\$158,200	Jun 2021	Aug 2021
2021	Aug	\$158,200	\$3,700	\$158,200	Jun 2021	Aug 2021
2021	Jul	\$156,100	\$2,500	\$156,100	Apr 2021	Jul 2021
2021	Jun	\$158,900	\$4,700	\$158,900	Mar 2021	Jun 2021
2021	May	\$168,200	\$14,200	\$168,200	Oct 2020	Apr 2021
2021	Apr	\$168,200	\$14,200	\$168,200	Oct 2020	Apr 2021
2021	Mar	\$171,500	\$12,000	\$171,500	Jul 2020	Mar 2021
2021	Feb	\$172,000	\$11,900	\$172,000	Jun 2020	Feb 2021
2021	Jan	\$173,900	\$10,400	\$173,900	Jun 2020	Oct 2020
2020	Mean	\$179,400	\$20,900	\$179,400	Jan 2020	Oct 2020
2020	Dec	\$173,900	\$10,400	\$173,900	Jun 2020	Oct 2020
2020	Nov	\$173,900	\$10,400	\$173,900	Jun 2020	Oct 2020
2020	Oct	\$173,900	\$10,400	\$173,900	Jun 2020	Oct 2020
2020	Sep	\$167,900	\$0	\$167,900	Jun 2020	Jul 2020
2020	Aug	\$169,100	\$2,400	\$169,100	Jun 2020	Jul 2020
2020	Jul	\$166,900	\$5,400	\$166,900	May 2020	Jul 2020
2020	Jun	\$168,000	\$7,000	\$168,000	Mar 2020	Jun 2020
2020	May	\$177,200	\$20,800	\$177,200	Feb 2020	May 2020
2020	Apr	\$195,100	\$25,200	\$195,100	Jan 2020	Apr 2020
2020	Mar	\$199,900	\$20,000	\$199,900	Dec 2019	Mar 2020
2020	Feb	\$206,500	\$16,300	\$206,500	Dec 2019	Feb 2020
2020	Jan	\$207,200	\$16,500	\$207,200	Jun 2019	Jan 2020
2019	Mean	\$210,400	\$8,600	\$210,400	Jan 2019	Dec 2019
2019	Dec	\$204,900	\$13,800	\$204,900	Jun 2019	Dec 2019
2019	Nov	\$214,000	\$2,600	\$214,000	May 2019	Jun 2019
2019	Oct	\$214,000	\$2,600	\$214,000	May 2019	Jun 2019
2019	Sep	\$214,000	\$2,600	\$214,000	May 2019	Jun 2019

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2019	Aug	\$214,000	\$2,600	\$214,000	May 2019	Jun 2019
2019	Jul	\$214,000	\$2,600	\$214,000	May 2019	Jun 2019
2019	Jun	\$214,200	\$2,400	\$214,200	Apr 2019	Jun 2019
2019	May	\$213,300	\$1,100	\$213,300	Mar 2019	May 2019
2019	Apr	\$213,300	\$1,100	\$213,300	Feb 2019	Apr 2019
2019	Mar	\$212,800	\$700	\$212,800	Jan 2019	Mar 2019
2019	Feb	\$213,200	\$1,500	\$213,200	Dec 2018	Feb 2019
2019	Jan	\$212,800	\$2,200	\$212,800	Jul 2018	Jan 2019
2018	Mean	\$203,900	\$7,900	\$203,900	Jan 2018	Dec 2018
2018	Dec	\$208,600	\$6,700	\$208,600	Jul 2018	Dec 2018
2018	Nov	\$205,500	\$5,100	\$205,500	Jul 2018	Jul 2018
2018	Oct	\$205,500	\$5,100	\$205,500	Jul 2018	Jul 2018
2018	Sep	\$205,500	\$5,100	\$205,500	Jul 2018	Jul 2018
2018	Aug	\$204,800	\$5,800	\$204,800	May 2018	Jul 2018
2018	Jul	\$204,800	\$5,800	\$204,800	May 2018	Jul 2018
2018	Jun	\$206,100	\$5,600	\$206,100	Mar 2018	Jun 2018
2018	May	\$206,500	\$3,600	\$206,500	Mar 2018	May 2018
2018	Apr	\$205,600	\$3,500	\$205,600	Mar 2018	Apr 2018
2018	Mar	\$199,600	\$8,200	\$199,600	Jan 2018	Mar 2018
2018	Feb	\$195,500	\$6,300	\$195,500	Dec 2017	Jan 2018
2018	Jan	\$195,500	\$6,300	\$195,500	Dec 2017	Jan 2018
2017	Mean	\$195,700	\$9,400	\$195,700	Jan 2017	Dec 2017
2017	Dec	\$198,300	\$5,700	\$198,300	Sep 2017	Dec 2017
2017	Nov	\$196,100	\$7,500	\$196,100	Jul 2017	Oct 2017
2017	Oct	\$196,100	\$7,500	\$196,100	Jul 2017	Oct 2017
2017	Sep	\$199,300	\$6,900	\$199,300	Jul 2017	Sep 2017
2017	Aug	\$197,200	\$6,200	\$197,200	May 2017	Jul 2017
2017	Jul	\$200,200	\$8,200	\$200,200	May 2017	Jul 2017
2017	Jun	\$203,200	\$5,100	\$203,200	Apr 2017	May 2017
2017	May	\$201,000	\$6,800	\$201,000	Mar 2017	May 2017

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2017	Apr	\$199,400	\$5,500	\$199,400	Mar 2017	Apr 2017
2017	Mar	\$184,900	\$6,200	\$184,900	Jan 2017	Mar 2017
2017	Feb	\$183,900	\$5,300	\$183,900	Dec 2016	Jan 2017
2017	Jan	\$183,900	\$5,300	\$183,900	Dec 2016	Jan 2017
2016	Mean	\$191,200	\$5,900	\$191,200	Feb 2016	Dec 2016
2016	Dec	\$184,100	\$4,100	\$184,100	Dec 2016	Dec 2016
2016	Nov	\$194,900	\$1,700	\$194,900	May 2016	Sep 2016
2016	Oct	\$194,900	\$1,700	\$194,900	May 2016	Sep 2016
2016	Sep	\$194,900	\$1,700	\$194,900	May 2016	Sep 2016
2016	Aug	\$194,900	\$1,700	\$194,900	May 2016	Jul 2016
2016	Jul	\$194,900	\$1,700	\$194,900	May 2016	Jul 2016
2016	Jun	\$192,700	\$2,600	\$192,700	Apr 2016	Jun 2016
2016	May	\$192,400	\$2,800	\$192,400	Apr 2016	May 2016
2016	Apr	\$194,000	\$4,600	\$194,000	Feb 2016	Apr 2016
2016	Mar	\$213,200	\$16,800	\$213,200	Jun 2015	Feb 2016
2016	Feb	\$213,200	\$16,800	\$213,200	Jun 2015	Feb 2016
2016	Jan	\$229,200	\$6,500	\$229,200	Jun 2015	Dec 2015
2015	Mean	\$244,500	\$19,200	\$244,500	Jan 2015	Dec 2015
2015	Dec	\$229,200	\$6,500	\$229,200	Jun 2015	Dec 2015
2015	Nov	\$231,500	\$5,300	\$231,500	May 2015	Jun 2015
2015	Oct	\$231,500	\$5,300	\$231,500	May 2015	Jun 2015
2015	Sep	\$231,500	\$5,300	\$231,500	May 2015	Jun 2015
2015	Aug	\$231,500	\$5,300	\$231,500	May 2015	Jun 2015
2015	Jul	\$231,500	\$5,300	\$231,500	May 2015	Jun 2015
2015	Jun	\$231,500	\$5,300	\$231,500	May 2015	Jun 2015
2015	May	\$249,500	\$19,000	\$249,500	Jan 2015	May 2015
2015	Apr	\$255,400	\$16,000	\$255,400	Jan 2015	Mar 2015
2015	Mar	\$259,300	\$16,400	\$259,300	Jan 2015	Mar 2015
2015	Feb	\$263,600	\$8,400	\$263,600	Dec 2014	Jan 2015
2015	Jan	\$260,700	\$9,500	\$260,700	Nov 2014	Jan 2015

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2014	Mean	\$268,200	\$15,400	\$268,200	Mar 2014	Dec 2014
2014	Dec	\$259,000	\$9,800	\$259,000	Jun 2014	Dec 2014
2014	Nov	\$270,400	\$20,400	\$270,400	Jun 2014	Nov 2014
2014	Oct	\$280,300	\$17,000	\$280,300	May 2014	Jul 2014
2014	Sep	\$280,300	\$17,000	\$280,300	May 2014	Jul 2014
2014	Aug	\$280,300	\$17,000	\$280,300	May 2014	Jul 2014
2014	Jul	\$276,700	\$16,800	\$276,700	May 2014	Jul 2014
2014	Jun	\$272,100	\$16,800	\$272,100	Apr 2014	Jun 2014
2014	May	\$268,900	\$10,200	\$268,900	Mar 2014	May 2014
2014	Apr	\$265,100	\$3,000	\$265,100	Dec 2013	Apr 2014
2014	Mar	\$266,200	\$3,900	\$266,200	Nov 2013	Mar 2014
2014	Feb	\$258,800	\$11,500	\$258,800	Oct 2013	Dec 2013
2014	Jan	\$258,800	\$11,500	\$258,800	Oct 2013	Dec 2013
2013	Mean	\$221,400	\$29,100	\$221,400	Jan 2013	Dec 2013
2013	Dec	\$251,000	\$18,700	\$251,000	Oct 2013	Dec 2013
2013	Nov	\$250,300	\$18,900	\$250,300	Sep 2013	Nov 2013
2013	Oct	\$237,800	\$22,600	\$237,800	Aug 2013	Oct 2013
2013	Sep	\$235,700	\$26,600	\$235,700	Jun 2013	Sep 2013
2013	Aug	\$205,500	\$5,000	\$205,500	May 2013	Aug 2013
2013	Jul	\$205,700	\$4,500	\$205,700	May 2013	Jun 2013
2013	Jun	\$204,700	\$4,700	\$204,700	Apr 2013	Jun 2013
2013	May	\$201,600	\$3,600	\$201,600	Mar 2013	May 2013
2013	Apr	\$199,700	\$1,700	\$199,700	Feb 2013	Apr 2013
2013	Mar	\$193,100	\$11,600	\$193,100	Jan 2013	Mar 2013
2013	Feb	\$198,600	\$20,700	\$198,600	Oct 2012	Feb 2013
2013	Jan	\$207,200	\$26,700	\$207,200	Jul 2012	Jan 2013
2012	Mean	\$228,000	\$13,100	\$228,000	Feb 2012	Dec 2012
2012	Dec	\$223,100	\$19,700	\$223,100	Jun 2012	Dec 2012
2012	Nov	\$231,500	\$5,600	\$231,500	Jun 2012	Oct 2012
2012	Oct	\$231,500	\$5,600	\$231,500	Jun 2012	Oct 2012

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2012	Sep	\$233,200	\$5,900	\$233,200	Jun 2012	Jul 2012
2012	Aug	\$232,500	\$4,600	\$232,500	Jun 2012	Jul 2012
2012	Jul	\$232,500	\$4,600	\$232,500	Jun 2012	Jul 2012
2012	Jun	\$231,800	\$4,700	\$231,800	Jun 2012	Jun 2012
2012	May	\$229,500	\$10,300	\$229,500	Feb 2012	Mar 2012
2012	Apr	\$229,500	\$10,300	\$229,500	Feb 2012	Mar 2012
2012	Mar	\$229,500	\$10,300	\$229,500	Feb 2012	Mar 2012
2012	Feb	\$218,200	\$18,300	\$218,200	Dec 2011	Feb 2012
2012	Jan	\$213,200	\$18,400	\$213,200	Nov 2011	Dec 2011
2011	Mean	\$193,200	\$14,100	\$193,200	Jan 2011	Dec 2011
2011	Dec	\$206,900	\$18,000	\$206,900	Oct 2011	Dec 2011
2011	Nov	\$201,300	\$16,500	\$201,300	Sep 2011	Nov 2011
2011	Oct	\$197,700	\$12,400	\$197,700	Aug 2011	Oct 2011
2011	Sep	\$194,900	\$7,500	\$194,900	Jul 2011	Sep 2011
2011	Aug	\$195,100	\$7,300	\$195,100	Jun 2011	Aug 2011
2011	Jul	\$190,500	\$4,900	\$190,500	May 2011	Jul 2011
2011	Jun	\$186,200	\$7,100	\$186,200	Apr 2011	Jun 2011
2011	May	\$185,700	\$6,800	\$185,700	Mar 2011	May 2011
2011	Apr	\$183,800	\$5,900	\$183,800	Feb 2011	Apr 2011
2011	Mar	\$186,500	\$4,100	\$186,500	Jan 2011	Mar 2011
2011	Feb	\$192,000	\$4,800	\$192,000	Dec 2010	Feb 2011
2011	Jan	\$195,300	\$4,200	\$195,300	Oct 2010	Jan 2011
2010	Mean	\$140,200	\$36,400	\$140,200	Dec 2009	Dec 2010
2010	Dec	\$200,300	\$8,600	\$200,300	Aug 2010	Dec 2010
2010	Nov	\$185,700	\$25,500	\$185,700	Jul 2010	Oct 2010
2010	Oct	\$185,700	\$25,500	\$185,700	Jul 2010	Oct 2010
2010	Sep	\$167,500	\$34,000	\$167,500	Jul 2010	Aug 2010
2010	Aug	\$162,500	\$32,000	\$162,500	Jun 2010	Aug 2010
2010	Jul	\$130,600	\$11,300	\$130,600	May 2010	Jul 2010
2010	Jun	\$124,300	\$10,700	\$124,300	Apr 2010	Jun 2010

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2010	May	\$121,300	\$8,300	\$121,300	Apr 2010	May 2010
2010	Apr	\$113,100	\$8,400	\$113,100	Feb 2010	Apr 2010
2010	Mar	\$107,100	\$6,000	\$107,100	Dec 2009	Feb 2010
2010	Feb	\$109,000	\$7,000	\$109,000	Dec 2009	Feb 2010
2010	Jan	\$102,000	\$11,300	\$102,000	Nov 2009	Dec 2009
2009	Mean	\$108,900	\$23,200	\$114,000	Dec 2008	Dec 2009
2009	Dec	\$100,400	\$10,600	\$100,400	Oct 2009	Dec 2009
2009	Nov	\$99,400	\$10,700	\$99,400	Apr 2009	Nov 2009
2009	Oct	\$134,300	\$32,600	\$134,300	Dec 2008	Oct 2009
2009	Sep	\$146,100	\$23,000	\$146,100	Dec 2008	Apr 2009
2009	Aug	\$146,100	\$23,000	\$146,100	Dec 2008	Apr 2009
2009	Jul	\$146,100	\$23,000	\$146,100	Dec 2008	Apr 2009
2009	Jun	\$146,100	\$23,000	\$146,100	Dec 2008	Apr 2009
2009	May	\$146,100	\$23,000	\$146,100	Dec 2008	Apr 2009
2009	Apr	\$146,100	\$23,000	\$146,100	Dec 2008	Apr 2009
2009	Mar	\$151,400	\$17,000	\$151,400	Nov 2008	Dec 2008
2009	Feb	\$151,400	\$17,000	\$151,400	Nov 2008	Dec 2008
2009	Jan	\$149,400	\$13,000	\$149,400	Nov 2008	Dec 2008
2008	Mean	\$107,400	\$31,500	\$107,400	Mar 2008	Dec 2008
2008	Dec	\$143,300	\$17,500	\$143,300	Oct 2008	Dec 2008
2008	Nov	\$131,700	\$15,100	\$131,700	Sep 2008	Nov 2008
2008	Oct	\$117,400	\$9,700	\$117,400	Aug 2008	Oct 2008
2008	Sep	\$116,800	\$9,300	\$116,800	Aug 2008	Sep 2008
2008	Aug	\$91,400	\$16,100	\$91,400	Jun 2008	Aug 2008
2008	Jul	\$84,800	\$11,300	\$84,800	Apr 2008	Jun 2008
2008	Jun	\$80,200	\$12,200	\$80,200	Apr 2008	Jun 2008
2008	May	\$78,500	\$11,400	\$78,500	Mar 2008	May 2008
2008	Apr	\$74,000	\$10,900	\$74,000	Mar 2008	Apr 2008
2008	Mar	\$59,200	\$8,100	\$59,200	Oct 2007	Mar 2008
2008	Feb	\$52,400	\$5,300	\$52,400	Aug 2007	Dec 2007

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2008	Jan	\$52,400	\$5,300	\$52,400	Aug 2007	Dec 2007
2007	Mean	\$46,200	\$6,100	\$46,200	Jan 2007	Dec 2007
2007	Dec	\$52,400	\$5,300	\$52,400	Aug 2007	Dec 2007
2007	Nov	\$47,300	\$3,000	\$47,300	Jul 2007	Oct 2007
2007	Oct	\$47,300	\$3,000	\$47,300	Jul 2007	Oct 2007
2007	Sep	\$45,500	\$600	\$45,500	Jul 2007	Aug 2007
2007	Aug	\$45,100	\$1,000	\$45,100	Jun 2007	Aug 2007
2007	Jul	\$44,100	\$2,600	\$44,100	May 2007	Jul 2007
2007	Jun	\$44,700	\$4,000	\$44,700	Apr 2007	Jun 2007
2007	May	\$44,900	\$4,300	\$44,900	Apr 2007	May 2007
2007	Apr	\$42,400	\$7,000	\$42,400	Oct 2006	Apr 2007
2007	Mar	\$40,000	\$4,600	\$40,000	Sep 2006	Jan 2007
2007	Feb	\$40,000	\$4,600	\$40,000	Sep 2006	Jan 2007
2007	Jan	\$40,000	\$4,600	\$40,000	Sep 2006	Jan 2007
2006	Mean	\$40,200	\$2,800	\$40,200	Jan 2006	Oct 2006
2006	Dec	\$42,700	\$3,000	\$42,700	Jul 2006	Oct 2006
2006	Nov	\$42,700	\$3,000	\$42,700	Jul 2006	Oct 2006
2006	Oct	\$42,700	\$3,000	\$42,700	Jul 2006	Oct 2006
2006	Sep	\$42,000	\$3,500	\$42,000	May 2006	Sep 2006
2006	Aug	\$40,000	\$2,700	\$40,000	Apr 2006	Jul 2006
2006	Jul	\$40,000	\$2,700	\$40,000	Apr 2006	Jul 2006
2006	Jun	\$38,500	\$0	\$38,500	Apr 2006	May 2006
2006	May	\$38,200	\$600	\$38,200	Mar 2006	May 2006
2006	Apr	\$38,100	\$700	\$38,100	Feb 2006	Apr 2006
2006	Mar	\$39,300	\$2,300	\$39,300	Jan 2006	Mar 2006
2006	Feb	\$37,200	\$4,200	\$37,200	Dec 2005	Feb 2006
2006	Jan	\$36,800	\$4,600	\$36,800	Dec 2005	Jan 2006
2005	Mean	\$30,600	\$3,700	\$30,600	Feb 2005	Dec 2005
2005	Dec	\$32,400	\$3,600	\$32,400	Jul 2005	Dec 2005
2005	Nov	\$30,700	\$5,200	\$30,700	Jul 2005	Sep 2005

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2005	Oct	\$30,700	\$5,200	\$30,700	Jul 2005	Sep 2005
2005	Sep	\$30,700	\$5,200	\$30,700	Jul 2005	Sep 2005
2005	Aug	\$29,500	\$4,200	\$29,500	Jun 2005	Jul 2005
2005	Jul	\$29,500	\$4,200	\$29,500	Jun 2005	Jul 2005
2005	Jun	\$30,200	\$1,100	\$30,200	Apr 2005	Jun 2005
2005	May	\$29,000	\$1,300	\$29,000	Feb 2005	Apr 2005
2005	Apr	\$29,000	\$1,300	\$29,000	Feb 2005	Apr 2005
2005	Mar	\$24,800	\$2,200	\$24,800	May 2004	Feb 2005
2005	Feb	\$24,800	\$2,200	\$24,800	May 2004	Feb 2005
2005	Jan	\$24,200	\$1,800	\$24,200	May 2004	Dec 2004
2004	Mean	\$23,000	\$2,300	\$23,000	Mar 2004	Dec 2004
2004	Dec	\$24,200	\$1,800	\$24,200	May 2004	Dec 2004
2004	Nov	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	Oct	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	Sep	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	Aug	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	Jul	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	Jun	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	May	\$23,000	\$2,600	\$23,000	Mar 2004	May 2004
2004	Apr	\$20,000	\$1,000	\$20,000	Jun 2003	Apr 2004
2004	Mar	\$21,400	\$3,300	\$21,400	May 2003	Mar 2004
2004	Feb	\$22,900	\$3,600	\$22,900	Nov 2002	Oct 2003
2004	Jan	\$22,900	\$3,600	\$22,900	Nov 2002	Oct 2003
2003	Mean	\$22,900	\$3,600	\$22,900	Nov 2002	Oct 2003
2003	Dec	\$22,900	\$3,600	\$22,900	Nov 2002	Oct 2003
2003	Nov	\$22,900	\$3,600	\$22,900	Nov 2002	Oct 2003
2003	Oct	\$22,900	\$3,600	\$22,900	Nov 2002	Oct 2003
2003	Sep	\$23,100	\$3,400	\$23,100	Jul 2002	Jun 2003
2003	Aug	\$23,100	\$3,400	\$23,100	Jul 2002	Jun 2003
2003	Jul	\$23,100	\$3,400	\$23,100	Jul 2002	Jun 2003

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2003	Jun	\$23,100	\$3,400	\$23,100	Jul 2002	Jun 2003
2003	May	\$27,100	\$4,800	\$27,100	Jun 2002	May 2003
2003	Apr	\$33,300	\$11,700	\$33,300	Jun 2002	Nov 2002
2003	Mar	\$33,300	\$11,700	\$33,300	Jun 2002	Nov 2002
2003	Feb	\$33,300	\$11,700	\$33,300	Jun 2002	Nov 2002
2003	Jan	\$33,300	\$11,700	\$33,300	Jun 2002	Nov 2002
2002	Mean	\$33,500	\$8,300	\$33,500	Dec 2001	Nov 2002
2002	Dec	\$33,300	\$11,700	\$33,300	Jun 2002	Nov 2002
2002	Nov	\$33,300	\$11,700	\$33,300	Jun 2002	Nov 2002
2002	Oct	\$34,600	\$11,100	\$34,600	Apr 2002	Jul 2002
2002	Sep	\$34,600	\$11,100	\$34,600	Apr 2002	Jul 2002
2002	Aug	\$34,600	\$11,100	\$34,600	Apr 2002	Jul 2002
2002	Jul	\$34,600	\$11,100	\$34,600	Apr 2002	Jul 2002
2002	Jun	\$38,000	\$8,100	\$38,000	Feb 2002	Jun 2002
2002	May	\$33,800	\$1,600	\$33,800	Dec 2001	Apr 2002
2002	Apr	\$33,800	\$1,600	\$33,800	Dec 2001	Apr 2002
2002	Mar	\$35,700	\$1,700	\$35,700	Jun 2001	Feb 2002
2002	Feb	\$35,700	\$1,700	\$35,700	Jun 2001	Feb 2002
2002	Jan	\$37,300	\$2,700	\$37,300	Jun 2001	Jan 2002
2001	Mean	\$39,000	\$4,900	\$39,000	Apr 2001	Dec 2001
2001	Dec	\$37,500	\$2,600	\$37,500	Jun 2001	Dec 2001
2001	Nov	\$37,900	\$2,300	\$37,900	May 2001	Jun 2001
2001	Oct	\$37,900	\$2,300	\$37,900	May 2001	Jun 2001
2001	Sep	\$37,900	\$2,300	\$37,900	May 2001	Jun 2001
2001	Aug	\$37,900	\$2,300	\$37,900	May 2001	Jun 2001
2001	Jul	\$37,900	\$2,300	\$37,900	May 2001	Jun 2001
2001	Jun	\$39,400	\$5,000	\$39,400	Apr 2001	Jun 2001
2001	May	\$40,000	\$5,800	\$40,000	Apr 2001	May 2001
2001	Apr	\$37,500	\$1,400	\$37,500	Apr 2001	Apr 2001
2001	Mar	\$42,400	\$3,700	\$42,400	Dec 2000	Dec 2000

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2001	Feb	\$42,200	\$3,300	\$42,200	Dec 2000	Dec 2000
2001	Jan	\$40,600	\$4,700	\$40,600	Nov 2000	Dec 2000
2000	Mean	\$39,700	\$4,200	\$39,700	Jan 2000	Dec 2000
2000	Dec	\$40,300	\$4,100	\$40,300	Oct 2000	Dec 2000
2000	Nov	\$36,400	\$3,000	\$36,400	Sep 2000	Nov 2000
2000	Oct	\$37,400	\$2,600	\$37,400	Sep 2000	Oct 2000
2000	Sep	\$35,600	\$1,400	\$35,600	Jun 2000	Sep 2000
2000	Aug	\$38,500	\$3,800	\$38,500	May 2000	Jul 2000
2000	Jul	\$38,000	\$3,500	\$38,000	May 2000	Jul 2000
2000	Jun	\$39,800	\$4,300	\$39,800	Apr 2000	Jun 2000
2000	May	\$42,400	\$3,700	\$42,400	Feb 2000	May 2000
2000	Apr	\$42,500	\$2,200	\$42,500	Dec 1999	Apr 2000
2000	Mar	\$40,500	\$2,400	\$40,500	Dec 1999	Feb 2000
2000	Feb	\$40,200	\$2,200	\$40,200	Nov 1999	Feb 2000
2000	Jan	\$38,700	\$2,300	\$38,700	Nov 1999	Jan 2000
1999	Mean	\$42,900	\$4,600	\$42,900	Feb 1999	Dec 1999
1999	Dec	\$37,700	\$1,500	\$37,700	Nov 1999	Dec 1999
1999	Nov	\$42,200	\$5,100	\$42,200	Jul 1999	Nov 1999
1999	Oct	\$45,900	\$1,800	\$45,900	Jun 1999	Aug 1999
1999	Sep	\$45,900	\$1,800	\$45,900	Jun 1999	Aug 1999
1999	Aug	\$45,900	\$1,800	\$45,900	Jun 1999	Aug 1999
1999	Jul	\$46,300	\$2,100	\$46,300	Mar 1999	Jul 1999
1999	Jun	\$46,100	\$2,000	\$46,100	Feb 1999	Jun 1999
1999	May	\$50,900	\$4,000	\$50,900	Dec 1998	Mar 1999
1999	Apr	\$50,900	\$4,000	\$50,900	Dec 1998	Mar 1999
1999	Mar	\$50,900	\$4,000	\$50,900	Dec 1998	Mar 1999
1999	Feb	\$53,100	\$4,400	\$53,100	Sep 1998	Feb 1999
1999	Jan	\$60,500	\$9,400	\$60,500	Jun 1998	Dec 1998
1998	Mean	\$67,800	\$9,600	\$67,800	Jan 1998	Dec 1998
1998	Dec	\$60,500	\$9,400	\$60,500	Jun 1998	Dec 1998

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1998	Nov	\$68,100	\$7,200	\$68,100	Jun 1998	Sep 1998
1998	Oct	\$68,100	\$7,200	\$68,100	Jun 1998	Sep 1998
1998	Sep	\$68,100	\$7,200	\$68,100	Jun 1998	Sep 1998
1998	Aug	\$72,800	\$3,900	\$72,800	May 1998	Jun 1998
1998	Jul	\$72,800	\$3,900	\$72,800	May 1998	Jun 1998
1998	Jun	\$72,800	\$3,900	\$72,800	May 1998	Jun 1998
1998	May	\$71,900	\$8,300	\$71,900	Dec 1997	May 1998
1998	Apr	\$73,400	\$9,400	\$73,400	Nov 1997	Mar 1998
1998	Mar	\$73,400	\$9,400	\$73,400	Nov 1997	Mar 1998
1998	Feb	\$75,800	\$10,400	\$75,800	Oct 1997	Jan 1998
1998	Jan	\$75,800	\$10,400	\$75,800	Oct 1997	Jan 1998
1997	Mean	\$69,300	\$8,300	\$69,300	Jan 1997	Dec 1997
1997	Dec	\$74,800	\$10,300	\$74,800	Oct 1997	Dec 1997
1997	Nov	\$76,200	\$8,200	\$76,200	Sep 1997	Nov 1997
1997	Oct	\$73,100	\$8,400	\$73,100	Aug 1997	Oct 1997
1997	Sep	\$66,000	\$6,900	\$66,000	Jun 1997	Sep 1997
1997	Aug	\$69,100	\$8,300	\$69,100	May 1997	Aug 1997
1997	Jul	\$66,500	\$7,000	\$66,500	Apr 1997	Jun 1997
1997	Jun	\$65,500	\$6,500	\$65,500	Apr 1997	Jun 1997
1997	May	\$67,700	\$5,700	\$67,700	Mar 1997	May 1997
1997	Apr	\$65,300	\$3,500	\$65,300	Mar 1997	Apr 1997
1997	Mar	\$66,300	\$2,500	\$66,300	Dec 1996	Mar 1997
1997	Feb	\$64,300	\$2,300	\$64,300	Nov 1996	Jan 1997
1997	Jan	\$63,300	\$2,900	\$63,300	Oct 1996	Jan 1997
1996	Mean	\$66,900	\$10,400	\$66,900	Feb 1996	Dec 1996
1996	Dec	\$60,800	\$1,600	\$60,800	Aug 1996	Dec 1996
1996	Nov	\$62,300	\$4,100	\$62,300	Jul 1996	Nov 1996
1996	Oct	\$69,300	\$12,100	\$69,300	Feb 1996	Oct 1996
1996	Sep	\$85,000	\$24,000	\$85,000	Dec 1995	Aug 1996
1996	Aug	\$85,000	\$24,000	\$85,000	Dec 1995	Aug 1996

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1996	Jul	\$102,800	\$30,500	\$109,800	Jun 1995	Jul 1996
1996	Jun	\$128,200	\$26,100	\$128,200	Jun 1995	Feb 1996
1996	May	\$128,200	\$26,100	\$128,200	Jun 1995	Feb 1996
1996	Apr	\$128,200	\$26,100	\$128,200	Jun 1995	Feb 1996
1996	Mar	\$128,200	\$26,100	\$128,200	Jun 1995	Feb 1996
1996	Feb	\$128,200	\$26,100	\$128,200	Jun 1995	Feb 1996
1996	Jan	\$141,000	\$13,000	\$141,000	May 1995	Dec 1995
1995	Mean	\$139,900	\$10,700	\$139,900	Feb 1995	Dec 1995
1995	Dec	\$141,000	\$13,000	\$141,000	May 1995	Dec 1995
1995	Nov	\$144,900	\$8,300	\$144,900	Mar 1995	Jun 1995
1995	Oct	\$144,900	\$8,300	\$144,900	Mar 1995	Jun 1995
1995	Sep	\$144,900	\$8,300	\$144,900	Mar 1995	Jun 1995
1995	Aug	\$144,900	\$8,300	\$144,900	Mar 1995	Jun 1995
1995	Jul	\$144,900	\$8,300	\$144,900	Mar 1995	Jun 1995
1995	Jun	\$144,900	\$8,300	\$144,900	Mar 1995	Jun 1995
1995	May	\$121,100	\$30,100	\$121,100	Nov 1994	May 1995
1995	Apr	\$112,200	\$28,300	\$112,200	Aug 1994	Mar 1995
1995	Mar	\$112,200	\$28,300	\$112,200	Aug 1994	Mar 1995
1995	Feb	\$98,800	\$25,700	\$98,800	Aug 1994	Feb 1995
1995	Jan	\$87,900	\$13,200	\$87,900	Jul 1994	Nov 1994
1994	Mean	\$73,900	\$16,200	\$73,900	Mar 1994	Nov 1994
1994	Dec	\$87,900	\$13,200	\$87,900	Jul 1994	Nov 1994
1994	Nov	\$87,900	\$13,200	\$87,900	Jul 1994	Nov 1994
1994	Oct	\$81,100	\$23,800	\$81,100	Jul 1994	Aug 1994
1994	Sep	\$75,500	\$19,400	\$75,500	Jul 1994	Aug 1994
1994	Aug	\$73,900	\$17,500	\$73,900	Jun 1994	Aug 1994
1994	Jul	\$67,200	\$12,900	\$67,200	May 1994	Jul 1994
1994	Jun	\$67,700	\$4,200	\$67,700	Apr 1994	Jun 1994
1994	May	\$75,000	\$15,200	\$75,000	Mar 1994	May 1994
1994	Apr	\$87,600	\$16,900	\$87,600	Dec 1993	Apr 1994

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1994	Mar	\$148,900	\$47,000	\$148,900	Aug 1993	Mar 1994
1994	Feb	\$179,100	\$47,700	\$179,100	Apr 1993	Dec 1993
1994	Jan	\$179,100	\$47,700	\$179,100	Apr 1993	Dec 1993
1993	Mean	\$200,100	\$41,300	\$200,100	Jan 1993	Dec 1993
1993	Dec	\$179,100	\$47,700	\$179,100	Apr 1993	Dec 1993
1993	Nov	\$198,700	\$22,100	\$198,700	Mar 1993	Sep 1993
1993	Oct	\$198,700	\$22,100	\$198,700	Mar 1993	Sep 1993
1993	Sep	\$198,700	\$22,100	\$198,700	Mar 1993	Sep 1993
1993	Aug	\$206,800	\$15,900	\$206,800	Mar 1993	Aug 1993
1993	Jul	\$209,500	\$17,800	\$209,500	Feb 1993	Apr 1993
1993	Jun	\$209,500	\$17,800	\$209,500	Feb 1993	Apr 1993
1993	May	\$209,500	\$17,800	\$209,500	Feb 1993	Apr 1993
1993	Apr	\$219,100	\$25,100	\$219,100	Feb 1993	Apr 1993
1993	Mar	\$217,000	\$24,900	\$217,000	Jan 1993	Mar 1993
1993	Feb	\$220,000	\$24,700	\$220,000	Dec 1992	Feb 1993
1993	Jan	\$199,800	\$18,400	\$199,800	Nov 1992	Jan 1993
1992	Mean	\$217,500	\$23,000	\$217,500	Jan 1992	Dec 1992
1992	Dec	\$196,900	\$16,700	\$196,900	Sep 1992	Dec 1992
1992	Nov	\$216,200	\$27,600	\$216,200	Jul 1992	Nov 1992
1992	Oct	\$228,700	\$19,700	\$228,700	Jul 1992	Sep 1992
1992	Sep	\$228,700	\$19,700	\$228,700	Jul 1992	Sep 1992
1992	Aug	\$228,000	\$12,700	\$228,000	Jun 1992	Jul 1992
1992	Jul	\$217,800	\$18,600	\$217,800	May 1992	Jul 1992
1992	Jun	\$216,800	\$21,500	\$216,800	Apr 1992	Jun 1992
1992	May	\$214,900	\$25,400	\$214,900	Mar 1992	May 1992
1992	Apr	\$297,000	\$93,000	\$297,000	Jul 1991	Apr 1992
1992	Mar	\$358,900	\$127,400	\$358,900	May 1991	Mar 1992
1992	Feb	\$411,800	\$100,300	\$411,800	Apr 1991	Jan 1992
1992	Jan	\$411,800	\$100,300	\$411,800	Apr 1991	Jan 1992
1991	Mean	\$482,500	\$53,700	\$482,500	Feb 1991	Jul 1991

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1991	Dec	\$453,000	\$38,100	\$453,000	Apr 1991	Jul 1991
1991	Nov	\$453,000	\$38,100	\$453,000	Apr 1991	Jul 1991
1991	Oct	\$453,000	\$38,100	\$453,000	Apr 1991	Jul 1991
1991	Sep	\$453,000	\$38,100	\$453,000	Apr 1991	Jul 1991
1991	Aug	\$453,000	\$38,100	\$453,000	Apr 1991	Jul 1991
1991	Jul	\$453,000	\$38,100	\$453,000	Apr 1991	Jul 1991
1991	Jun	\$471,800	\$60,100	\$471,800	Apr 1991	May 1991
1991	May	\$477,000	\$54,600	\$477,000	Mar 1991	May 1991
1991	Apr	\$481,900	\$59,000	\$481,900	Feb 1991	Apr 1991
1991	Mar	\$559,900	\$94,300	\$559,900	Nov 1990	Mar 1991
1991	Feb	\$552,500	\$128,300	\$552,500	Oct 1990	Feb 1991
1991	Jan	\$564,200	\$129,400	\$564,200	Jun 1990	Nov 1990
1990	Mean	\$649,300	\$50,700	\$649,300	Jan 1990	Nov 1990
1990	Dec	\$653,200	\$59,400	\$653,200	Jun 1990	Nov 1990
1990	Nov	\$564,200	\$129,400	\$564,200	Jun 1990	Nov 1990
1990	Oct	\$558,200	\$119,400	\$558,200	Jan 1990	Oct 1990
1990	Sep	\$646,400	\$57,900	\$662,000	Jun 1989	Jun 1990
1990	Aug	\$646,400	\$57,900	\$662,000	Jun 1989	Jun 1990
1990	Jul	\$646,400	\$57,900	\$662,000	Jun 1989	Jun 1990
1990	Jun	\$646,400	\$57,900	\$662,000	Jun 1989	Jun 1990
1990	May	\$663,800	\$66,400	\$663,800	Jun 1989	May 1990
1990	Apr	\$603,300	\$144,800	\$603,300	Jun 1989	Jan 1990
1990	Mar	\$603,300	\$144,800	\$603,300	Jun 1989	Jan 1990
1990	Feb	\$603,300	\$144,800	\$603,300	Jun 1989	Jan 1990
1990	Jan	\$603,300	\$144,800	\$603,300	Jun 1989	Jan 1990
1989	Mean	\$591,800	\$147,400	\$591,800	Jan 1989	Jun 1989
1989	Dec	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989
1989	Nov	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989
1989	Oct	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989
1989	Sep	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1989	Aug	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989
1989	Jul	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989
1989	Jun	\$631,000	\$163,500	\$631,000	Mar 1989	Jun 1989
1989	May	\$582,000	\$117,700	\$582,000	Nov 1988	Mar 1989
1989	Apr	\$582,000	\$117,700	\$582,000	Nov 1988	Mar 1989
1989	Mar	\$582,000	\$117,700	\$582,000	Nov 1988	Mar 1989
1989	Feb	\$492,800	\$55,200	\$492,800	Jun 1988	Jan 1989
1989	Jan	\$492,800	\$55,200	\$492,800	Jun 1988	Jan 1989
1988	Mean	\$373,200	\$70,100	\$373,200	Jan 1988	Nov 1988
1988	Dec	\$423,100	\$61,800	\$423,100	Jun 1988	Nov 1988
1988	Nov	\$423,100	\$61,800	\$423,100	Jun 1988	Nov 1988
1988	Oct	\$396,900	\$23,400	\$396,900	Jun 1988	Jun 1988
1988	Sep	\$396,900	\$23,400	\$396,900	Jun 1988	Jun 1988
1988	Aug	\$396,900	\$23,400	\$396,900	Jun 1988	Jun 1988
1988	Jul	\$406,700	\$28,700	\$406,700	May 1988	Jun 1988
1988	Jun	\$383,800	\$60,400	\$383,800	Apr 1988	Jun 1988
1988	May	\$360,800	\$72,500	\$360,800	Mar 1988	May 1988
1988	Apr	\$339,700	\$67,000	\$339,700	Feb 1988	Apr 1988
1988	Mar	\$343,600	\$54,100	\$343,600	Jan 1988	Mar 1988
1988	Feb	\$341,100	\$39,600	\$341,100	Dec 1987	Feb 1988
1988	Jan	\$346,100	\$44,000	\$346,100	Nov 1987	Jan 1988
1987	Mean	\$252,300	\$46,500	\$252,300	Jan 1987	Dec 1987
1987	Dec	\$312,100	\$60,100	\$312,100	Oct 1987	Dec 1987
1987	Nov	\$280,000	\$59,900	\$280,000	Jul 1987	Nov 1987
1987	Oct	\$250,000	\$30,400	\$250,000	Jun 1987	Oct 1987
1987	Sep	\$256,800	\$31,800	\$256,800	Jun 1987	Jul 1987
1987	Aug	\$254,600	\$28,800	\$254,600	Jun 1987	Jul 1987
1987	Jul	\$249,000	\$26,500	\$249,000	May 1987	Jul 1987
1987	Jun	\$248,600	\$24,800	\$248,600	Apr 1987	Jun 1987
1987	May	\$233,300	\$11,100	\$233,300	Mar 1987	May 1987

Year	Month	Estimated Time- Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1987	Apr	\$226,300	\$14,300	\$226,300	Feb 1987	Apr 1987
1987	Mar	\$220,800	\$12,200	\$220,800	Jan 1987	Mar 1987
1987	Feb	\$222,100	\$12,300	\$222,100	Dec 1986	Feb 1987
1987	Jan	\$281,000	\$83,900	\$281,000	Oct 1986	Jan 1987

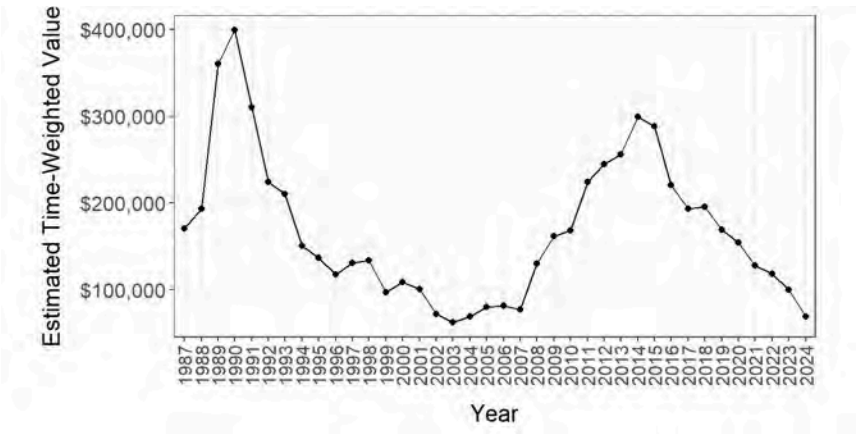
Alaska Commercial Fisheries Entry Commission

Estimated Permit Value Report

(S03E) Salmon, Drift Gillnet, Prince William Sound

Click here (<https://www.cfec.state.ak.us/pmtvalue/RPTDESC.html>) for an explanation of this report. All values are given in 2024 dollars. To download data as a CSV file, click here (https://www.cfec.state.ak.us/pmtvalue/permit_value_data.csv). For pre-1987 data, click here (https://www.cfec.state.ak.us/pmtvalue/pre1987_main.html).

Estimated time-weighted permit value in June of each year



Historical estimated permit values

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2024	Mean	\$72,800	\$6,000	\$72,800	Jan 2024	Jul 2024
2024	Oct	\$74,900	\$2,900	\$74,900	Jun 2024	Jul 2024
2024	Sep	\$74,900	\$2,900	\$74,900	Jun 2024	Jul 2024
2024	Aug	\$74,900	\$2,900	\$74,900	Jun 2024	Jul 2024
2024	Jul	\$70,900	\$5,300	\$70,900	May 2024	Jul 2024
2024	Jun	\$69,300	\$4,800	\$69,300	Apr 2024	Jun 2024
2024	May	\$70,300	\$6,400	\$70,300	Mar 2024	May 2024
2024	Apr	\$74,200	\$6,100	\$74,200	Feb 2024	Apr 2024

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2024	Mar	\$75,800	\$6,100	\$75,800	Jan 2024	Mar 2024
2024	Feb	\$77,900	\$4,600	\$77,900	Nov 2023	Feb 2024
2024	Jan	\$87,500	\$7,000	\$87,500	Jul 2023	Jan 2024
2023	Mean	\$99,100	\$6,700	\$99,100	Jan 2023	Nov 2023
2023	Dec	\$92,200	\$6,700	\$92,200	May 2023	Nov 2023
2023	Nov	\$92,200	\$6,700	\$92,200	May 2023	Nov 2023
2023	Oct	\$95,400	\$2,700	\$95,400	Apr 2023	Sep 2023
2023	Sep	\$95,400	\$2,700	\$95,400	Apr 2023	Sep 2023
2023	Aug	\$97,100	\$1,900	\$97,100	Apr 2023	Jul 2023
2023	Jul	\$97,100	\$1,900	\$97,100	Apr 2023	Jul 2023
2023	Jun	\$100,100	\$3,900	\$100,100	Mar 2023	May 2023
2023	May	\$100,200	\$3,400	\$100,200	Mar 2023	May 2023
2023	Apr	\$101,100	\$3,700	\$101,100	Feb 2023	Apr 2023
2023	Mar	\$103,700	\$2,700	\$103,700	Jan 2023	Mar 2023
2023	Feb	\$107,900	\$2,900	\$107,900	Dec 2022	Feb 2023
2023	Jan	\$108,700	\$2,800	\$108,700	Dec 2022	Jan 2023
2022	Mean	\$115,900	\$5,500	\$115,900	Jan 2022	Dec 2022
2022	Dec	\$111,400	\$0	\$111,400	Aug 2022	Dec 2022
2022	Nov	\$114,600	\$3,900	\$114,600	Jun 2022	Oct 2022
2022	Oct	\$114,600	\$3,900	\$114,600	Jun 2022	Oct 2022
2022	Sep	\$115,600	\$3,400	\$115,600	Jun 2022	Aug 2022
2022	Aug	\$117,800	\$4,200	\$117,800	Jun 2022	Aug 2022
2022	Jul	\$120,300	\$4,100	\$120,300	May 2022	Jun 2022
2022	Jun	\$118,200	\$5,500	\$118,200	Mar 2022	Jun 2022
2022	May	\$117,300	\$6,500	\$117,300	Feb 2022	May 2022
2022	Apr	\$115,300	\$5,800	\$115,300	Feb 2022	Apr 2022
2022	Mar	\$114,600	\$5,500	\$114,600	Jan 2022	Mar 2022
2022	Feb	\$117,900	\$5,700	\$117,900	Dec 2021	Feb 2022
2022	Jan	\$118,400	\$6,200	\$118,400	Dec 2021	Jan 2022
2021	Mean	\$126,000	\$6,300	\$126,000	Jan 2021	Dec 2021

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2021	Dec	\$123,100	\$4,300	\$123,100	Oct 2021	Dec 2021
2021	Nov	\$126,300	\$7,300	\$126,300	Jun 2021	Oct 2021
2021	Oct	\$126,300	\$7,300	\$126,300	Jun 2021	Oct 2021
2021	Sep	\$125,400	\$7,400	\$125,400	May 2021	Jul 2021
2021	Aug	\$125,400	\$7,400	\$125,400	May 2021	Jul 2021
2021	Jul	\$127,700	\$6,900	\$127,700	Apr 2021	Jul 2021
2021	Jun	\$127,700	\$7,100	\$127,700	Apr 2021	Jun 2021
2021	May	\$128,700	\$6,200	\$128,700	Apr 2021	May 2021
2021	Apr	\$126,200	\$6,300	\$126,200	Feb 2021	Apr 2021
2021	Mar	\$122,300	\$2,500	\$122,300	Dec 2020	Feb 2021
2021	Feb	\$122,400	\$2,200	\$122,400	Nov 2020	Feb 2021
2021	Jan	\$123,600	\$3,700	\$123,600	Nov 2020	Jan 2021
2020	Mean	\$149,800	\$21,000	\$149,800	Jan 2020	Dec 2020
2020	Dec	\$124,800	\$5,000	\$124,800	Oct 2020	Dec 2020
2020	Nov	\$126,100	\$4,800	\$126,100	Oct 2020	Nov 2020
2020	Oct	\$151,400	\$14,900	\$151,400	May 2020	Oct 2020
2020	Sep	\$155,900	\$10,400	\$155,900	May 2020	Jul 2020
2020	Aug	\$155,900	\$10,400	\$155,900	May 2020	Jul 2020
2020	Jul	\$155,900	\$10,400	\$155,900	May 2020	Jul 2020
2020	Jun	\$154,700	\$7,000	\$154,700	Apr 2020	Jun 2020
2020	May	\$159,200	\$9,400	\$159,200	Mar 2020	May 2020
2020	Apr	\$167,600	\$7,100	\$167,600	Feb 2020	Apr 2020
2020	Mar	\$174,800	\$2,900	\$174,800	Dec 2019	Mar 2020
2020	Feb	\$175,700	\$2,600	\$175,700	Nov 2019	Feb 2020
2020	Jan	\$176,200	\$2,400	\$176,200	Oct 2019	Jan 2020
2019	Mean	\$171,600	\$5,100	\$171,600	Feb 2019	Dec 2019
2019	Dec	\$174,500	\$1,500	\$174,500	Jul 2019	Dec 2019
2019	Nov	\$173,800	\$2,500	\$173,800	Jun 2019	Nov 2019
2019	Oct	\$169,200	\$6,900	\$169,200	May 2019	Oct 2019
2019	Sep	\$167,700	\$5,800	\$167,700	May 2019	Jul 2019

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2019	Aug	\$167,700	\$5,800	\$167,700	May 2019	Jul 2019
2019	Jul	\$167,700	\$5,800	\$167,700	May 2019	Jul 2019
2019	Jun	\$169,000	\$5,400	\$169,000	Apr 2019	Jun 2019
2019	May	\$168,700	\$5,900	\$168,700	Apr 2019	May 2019
2019	Apr	\$173,000	\$3,000	\$173,000	Feb 2019	Apr 2019
2019	Mar	\$183,700	\$4,500	\$183,700	Nov 2018	Feb 2019
2019	Feb	\$183,700	\$4,500	\$183,700	Nov 2018	Feb 2019
2019	Jan	\$186,600	\$1,200	\$186,600	Oct 2018	Dec 2018
2018	Mean	\$190,200	\$7,100	\$190,200	Jan 2018	Dec 2018
2018	Dec	\$186,600	\$1,200	\$186,600	Oct 2018	Dec 2018
2018	Nov	\$189,700	\$4,700	\$189,700	Jul 2018	Nov 2018
2018	Oct	\$193,600	\$5,800	\$193,600	May 2018	Oct 2018
2018	Sep	\$196,100	\$4,900	\$196,100	May 2018	Jul 2018
2018	Aug	\$196,100	\$4,900	\$196,100	May 2018	Jul 2018
2018	Jul	\$196,100	\$4,900	\$196,100	May 2018	Jul 2018
2018	Jun	\$195,400	\$4,800	\$195,400	Apr 2018	May 2018
2018	May	\$195,400	\$4,800	\$195,400	Apr 2018	May 2018
2018	Apr	\$191,300	\$6,000	\$191,300	Feb 2018	Apr 2018
2018	Mar	\$187,900	\$8,900	\$187,900	Jan 2018	Feb 2018
2018	Feb	\$183,900	\$8,700	\$183,900	Nov 2017	Feb 2018
2018	Jan	\$176,800	\$900	\$176,800	Nov 2017	Jan 2018
2017	Mean	\$187,200	\$10,700	\$187,200	Jan 2017	Dec 2017
2017	Dec	\$176,700	\$2,800	\$176,700	Oct 2017	Dec 2017
2017	Nov	\$176,600	\$3,100	\$176,600	Oct 2017	Nov 2017
2017	Oct	\$176,900	\$4,600	\$176,900	Jul 2017	Oct 2017
2017	Sep	\$185,700	\$8,300	\$185,700	May 2017	Aug 2017
2017	Aug	\$185,700	\$8,300	\$185,700	May 2017	Aug 2017
2017	Jul	\$189,900	\$9,700	\$189,900	May 2017	Jul 2017
2017	Jun	\$193,600	\$7,000	\$193,600	Apr 2017	Jun 2017
2017	May	\$194,000	\$7,700	\$194,000	Mar 2017	May 2017

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2017	Apr	\$197,700	\$7,600	\$197,700	Feb 2017	Apr 2017
2017	Mar	\$193,100	\$11,100	\$193,100	Jan 2017	Mar 2017
2017	Feb	\$183,200	\$17,400	\$183,200	Dec 2016	Feb 2017
2017	Jan	\$177,100	\$13,900	\$177,100	Dec 2016	Jan 2017
2016	Mean	\$201,000	\$26,300	\$201,000	Jan 2016	Dec 2016
2016	Dec	\$173,700	\$14,000	\$173,700	Oct 2016	Dec 2016
2016	Nov	\$174,600	\$12,100	\$174,600	Aug 2016	Oct 2016
2016	Oct	\$174,600	\$12,100	\$174,600	Aug 2016	Oct 2016
2016	Sep	\$194,000	\$22,900	\$194,000	Apr 2016	Aug 2016
2016	Aug	\$194,000	\$22,900	\$194,000	Apr 2016	Aug 2016
2016	Jul	\$210,100	\$21,700	\$210,100	Apr 2016	Jul 2016
2016	Jun	\$221,100	\$6,300	\$221,100	Mar 2016	Apr 2016
2016	May	\$222,600	\$6,800	\$222,600	Mar 2016	Apr 2016
2016	Apr	\$223,100	\$6,500	\$223,100	Feb 2016	Apr 2016
2016	Mar	\$223,100	\$4,900	\$223,100	Jan 2016	Mar 2016
2016	Feb	\$254,000	\$31,000	\$254,000	May 2015	Feb 2016
2016	Jan	\$269,100	\$28,500	\$269,100	May 2015	Jan 2016
2015	Mean	\$293,600	\$10,000	\$293,600	Jan 2015	Jun 2015
2015	Dec	\$286,100	\$2,700	\$286,100	May 2015	Jun 2015
2015	Nov	\$286,100	\$2,700	\$286,100	May 2015	Jun 2015
2015	Oct	\$286,100	\$2,700	\$286,100	May 2015	Jun 2015
2015	Sep	\$286,100	\$2,700	\$286,100	May 2015	Jun 2015
2015	Aug	\$286,100	\$2,700	\$286,100	May 2015	Jun 2015
2015	Jul	\$284,700	\$3,000	\$284,700	May 2015	Jun 2015
2015	Jun	\$288,700	\$7,400	\$288,700	Apr 2015	Jun 2015
2015	May	\$291,300	\$8,900	\$291,300	Mar 2015	May 2015
2015	Apr	\$299,000	\$9,000	\$299,000	Feb 2015	Apr 2015
2015	Mar	\$305,800	\$2,000	\$305,800	Jan 2015	Mar 2015
2015	Feb	\$302,600	\$4,700	\$302,600	Nov 2014	Feb 2015
2015	Jan	\$302,700	\$4,800	\$302,700	Aug 2014	Jan 2015

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2014	Mean	\$293,800	\$17,300	\$293,800	Jan 2014	Nov 2014
2014	Dec	\$308,100	\$8,000	\$308,100	Jun 2014	Nov 2014
2014	Nov	\$308,100	\$8,000	\$308,100	Jun 2014	Nov 2014
2014	Oct	\$311,400	\$3,300	\$311,400	May 2014	Aug 2014
2014	Sep	\$311,400	\$3,300	\$311,400	May 2014	Aug 2014
2014	Aug	\$311,400	\$3,300	\$311,400	May 2014	Aug 2014
2014	Jul	\$309,400	\$2,600	\$309,400	May 2014	Jun 2014
2014	Jun	\$299,600	\$15,000	\$299,600	Apr 2014	Jun 2014
2014	May	\$296,800	\$13,700	\$296,800	Mar 2014	May 2014
2014	Apr	\$287,000	\$14,700	\$287,000	Feb 2014	Apr 2014
2014	Mar	\$278,100	\$12,900	\$278,100	Jan 2014	Mar 2014
2014	Feb	\$269,700	\$8,600	\$269,700	Dec 2013	Feb 2014
2014	Jan	\$266,800	\$1,200	\$266,800	Dec 2013	Jan 2014
2013	Mean	\$260,100	\$11,100	\$260,100	Jan 2013	Dec 2013
2013	Dec	\$270,500	\$3,300	\$270,500	Oct 2013	Dec 2013
2013	Nov	\$272,300	\$1,400	\$272,300	Sep 2013	Oct 2013
2013	Oct	\$275,000	\$5,500	\$275,000	Aug 2013	Oct 2013
2013	Sep	\$270,100	\$9,500	\$270,100	May 2013	Sep 2013
2013	Aug	\$266,000	\$12,100	\$266,000	Apr 2013	Aug 2013
2013	Jul	\$260,100	\$4,000	\$260,100	Apr 2013	May 2013
2013	Jun	\$256,200	\$5,500	\$256,200	Apr 2013	May 2013
2013	May	\$254,900	\$5,200	\$254,900	Mar 2013	May 2013
2013	Apr	\$253,200	\$4,200	\$253,200	Mar 2013	Apr 2013
2013	Mar	\$248,900	\$4,700	\$248,900	Jan 2013	Mar 2013
2013	Feb	\$251,700	\$7,600	\$251,700	Nov 2012	Jan 2013
2013	Jan	\$251,700	\$7,600	\$251,700	Nov 2012	Jan 2013
2012	Mean	\$243,700	\$9,300	\$243,700	Feb 2012	Dec 2012
2012	Dec	\$257,400	\$2,000	\$257,400	Oct 2012	Dec 2012
2012	Nov	\$254,200	\$5,700	\$254,200	Sep 2012	Nov 2012
2012	Oct	\$253,500	\$6,200	\$253,500	Sep 2012	Oct 2012

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2012	Sep	\$245,700	\$2,600	\$245,700	May 2012	Sep 2012
2012	Aug	\$246,100	\$2,300	\$246,100	May 2012	Jun 2012
2012	Jul	\$245,600	\$2,000	\$245,600	May 2012	Jun 2012
2012	Jun	\$245,200	\$1,700	\$245,200	Apr 2012	Jun 2012
2012	May	\$242,400	\$5,000	\$242,400	Mar 2012	May 2012
2012	Apr	\$237,900	\$7,400	\$237,900	Feb 2012	Apr 2012
2012	Mar	\$235,400	\$7,300	\$235,400	Feb 2012	Mar 2012
2012	Feb	\$233,500	\$9,100	\$233,500	Dec 2011	Feb 2012
2012	Jan	\$224,500	\$6,200	\$224,500	Nov 2011	Dec 2011
2011	Mean	\$223,700	\$12,500	\$223,700	Jan 2011	Dec 2011
2011	Dec	\$226,900	\$8,300	\$226,900	Oct 2011	Dec 2011
2011	Nov	\$226,200	\$7,200	\$226,200	Sep 2011	Nov 2011
2011	Oct	\$234,600	\$6,900	\$234,600	Jul 2011	Oct 2011
2011	Sep	\$234,600	\$6,900	\$234,600	Jun 2011	Sep 2011
2011	Aug	\$234,600	\$6,900	\$234,600	May 2011	Aug 2011
2011	Jul	\$233,400	\$6,600	\$233,400	May 2011	Jul 2011
2011	Jun	\$224,100	\$16,000	\$224,100	Apr 2011	Jun 2011
2011	May	\$222,500	\$14,200	\$222,500	Feb 2011	May 2011
2011	Apr	\$219,500	\$14,100	\$219,500	Feb 2011	Apr 2011
2011	Mar	\$217,800	\$7,400	\$217,800	Jan 2011	Mar 2011
2011	Feb	\$220,700	\$10,000	\$220,700	Nov 2010	Feb 2011
2011	Jan	\$220,400	\$11,100	\$220,400	Nov 2010	Jan 2011
2010	Mean	\$182,900	\$29,200	\$182,900	Dec 2009	Dec 2010
2010	Dec	\$225,700	\$9,800	\$225,700	Oct 2010	Dec 2010
2010	Nov	\$223,700	\$13,700	\$223,700	Sep 2010	Nov 2010
2010	Oct	\$216,100	\$20,700	\$216,100	Aug 2010	Oct 2010
2010	Sep	\$211,200	\$21,100	\$211,200	Jul 2010	Sep 2010
2010	Aug	\$192,900	\$10,400	\$192,900	Jun 2010	Aug 2010
2010	Jul	\$173,600	\$16,700	\$173,600	May 2010	Jul 2010
2010	Jun	\$168,700	\$12,300	\$168,700	Mar 2010	Jun 2010

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2010	May	\$163,400	\$9,800	\$163,400	Mar 2010	May 2010
2010	Apr	\$161,900	\$7,200	\$161,900	Feb 2010	Apr 2010
2010	Mar	\$159,100	\$8,300	\$159,100	Dec 2009	Mar 2010
2010	Feb	\$157,900	\$7,300	\$157,900	Nov 2009	Feb 2010
2010	Jan	\$157,400	\$7,400	\$157,400	Nov 2009	Jan 2010
2009	Mean	\$160,700	\$11,000	\$160,900	Dec 2008	Dec 2009
2009	Dec	\$154,400	\$3,400	\$154,400	Oct 2009	Dec 2009
2009	Nov	\$155,900	\$3,900	\$155,900	Oct 2009	Nov 2009
2009	Oct	\$157,300	\$4,700	\$157,300	Aug 2009	Oct 2009
2009	Sep	\$161,500	\$600	\$161,500	Jun 2009	Aug 2009
2009	Aug	\$161,500	\$600	\$161,500	Jun 2009	Aug 2009
2009	Jul	\$161,000	\$1,000	\$161,000	May 2009	Jun 2009
2009	Jun	\$162,200	\$2,200	\$162,200	Apr 2009	Jun 2009
2009	May	\$164,200	\$3,300	\$164,200	Mar 2009	May 2009
2009	Apr	\$163,800	\$9,600	\$163,800	Feb 2009	Apr 2009
2009	Mar	\$164,500	\$16,100	\$164,500	Dec 2008	Mar 2009
2009	Feb	\$161,500	\$17,900	\$161,500	Dec 2008	Feb 2009
2009	Jan	\$156,300	\$18,600	\$156,300	Nov 2008	Jan 2009
2008	Mean	\$131,800	\$14,800	\$131,800	Jan 2008	Dec 2008
2008	Dec	\$145,800	\$17,100	\$145,800	Oct 2008	Dec 2008
2008	Nov	\$140,800	\$14,000	\$140,800	Sep 2008	Nov 2008
2008	Oct	\$132,300	\$10,600	\$132,300	Sep 2008	Oct 2008
2008	Sep	\$137,700	\$6,600	\$137,700	May 2008	Sep 2008
2008	Aug	\$134,800	\$5,500	\$134,800	Apr 2008	Jul 2008
2008	Jul	\$134,800	\$5,500	\$134,800	Apr 2008	Jul 2008
2008	Jun	\$130,300	\$8,300	\$130,300	Apr 2008	May 2008
2008	May	\$130,500	\$7,700	\$130,500	Mar 2008	May 2008
2008	Apr	\$128,200	\$6,500	\$128,200	Jan 2008	Apr 2008
2008	Mar	\$121,100	\$10,200	\$121,100	Jan 2008	Mar 2008
2008	Feb	\$118,600	\$9,800	\$118,600	Jan 2008	Feb 2008

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2008	Jan	\$116,600	\$10,500	\$116,600	Jan 2008	Jan 2008
2007	Mean	\$77,900	\$3,500	\$77,900	Jan 2007	Oct 2007
2007	Dec	\$81,200	\$1,900	\$81,200	Aug 2007	Oct 2007
2007	Nov	\$81,200	\$1,900	\$81,200	Aug 2007	Oct 2007
2007	Oct	\$81,100	\$1,700	\$81,100	Aug 2007	Oct 2007
2007	Sep	\$80,000	\$1,900	\$80,000	Jul 2007	Sep 2007
2007	Aug	\$80,300	\$1,900	\$80,300	Jun 2007	Aug 2007
2007	Jul	\$78,500	\$2,300	\$78,500	Apr 2007	Jul 2007
2007	Jun	\$77,400	\$3,700	\$77,400	Apr 2007	Jun 2007
2007	May	\$77,000	\$3,500	\$77,000	Feb 2007	May 2007
2007	Apr	\$76,500	\$3,800	\$76,500	Jan 2007	Apr 2007
2007	Mar	\$75,400	\$2,200	\$75,400	Jan 2007	Feb 2007
2007	Feb	\$76,600	\$4,300	\$76,600	Dec 2006	Feb 2007
2007	Jan	\$76,900	\$5,600	\$76,900	Dec 2006	Jan 2007
2006	Mean	\$79,500	\$5,300	\$79,500	Feb 2006	Dec 2006
2006	Dec	\$78,100	\$5,600	\$78,100	Dec 2006	Dec 2006
2006	Nov	\$73,100	\$6,800	\$73,100	Aug 2006	Sep 2006
2006	Oct	\$73,100	\$6,800	\$73,100	Aug 2006	Sep 2006
2006	Sep	\$73,100	\$6,800	\$73,100	Aug 2006	Sep 2006
2006	Aug	\$75,100	\$8,500	\$75,100	May 2006	Aug 2006
2006	Jul	\$81,200	\$3,500	\$81,200	May 2006	May 2006
2006	Jun	\$81,700	\$3,300	\$81,700	Apr 2006	May 2006
2006	May	\$81,000	\$3,600	\$81,000	Mar 2006	May 2006
2006	Apr	\$81,000	\$3,500	\$81,000	Feb 2006	Apr 2006
2006	Mar	\$80,100	\$3,600	\$80,100	Feb 2006	Mar 2006
2006	Feb	\$78,000	\$4,500	\$78,000	Sep 2005	Feb 2006
2006	Jan	\$75,500	\$4,600	\$75,500	Aug 2005	Nov 2005
2005	Mean	\$76,700	\$7,400	\$76,700	Jan 2005	Nov 2005
2005	Dec	\$75,500	\$4,600	\$75,500	Aug 2005	Nov 2005
2005	Nov	\$75,500	\$4,600	\$75,500	Aug 2005	Nov 2005

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2005	Oct	\$75,500	\$4,600	\$75,500	Aug 2005	Oct 2005
2005	Sep	\$73,500	\$7,000	\$73,500	Jul 2005	Sep 2005
2005	Aug	\$76,300	\$9,300	\$76,300	Jun 2005	Aug 2005
2005	Jul	\$78,500	\$10,400	\$78,500	May 2005	Jul 2005
2005	Jun	\$80,100	\$7,600	\$80,100	Apr 2005	Jun 2005
2005	May	\$78,000	\$7,400	\$78,000	Mar 2005	May 2005
2005	Apr	\$76,700	\$4,300	\$76,700	Feb 2005	Apr 2005
2005	Mar	\$73,100	\$4,800	\$73,100	Jan 2005	Mar 2005
2005	Feb	\$70,700	\$5,300	\$70,700	Nov 2004	Feb 2005
2005	Jan	\$68,300	\$3,200	\$68,300	Nov 2004	Jan 2005
2004	Mean	\$66,400	\$5,200	\$66,400	Jan 2004	Dec 2004
2004	Dec	\$65,800	\$5,100	\$65,800	Oct 2004	Dec 2004
2004	Nov	\$64,000	\$4,400	\$64,000	Sep 2004	Nov 2004
2004	Oct	\$62,200	\$3,000	\$62,200	Jul 2004	Oct 2004
2004	Sep	\$65,300	\$2,900	\$65,300	Jun 2004	Sep 2004
2004	Aug	\$68,200	\$4,100	\$68,200	May 2004	Jul 2004
2004	Jul	\$67,400	\$3,500	\$67,400	May 2004	Jul 2004
2004	Jun	\$69,100	\$5,100	\$69,100	Mar 2004	Jun 2004
2004	May	\$67,700	\$5,400	\$67,700	Mar 2004	May 2004
2004	Apr	\$67,200	\$5,600	\$67,200	Feb 2004	Apr 2004
2004	Mar	\$64,800	\$4,800	\$64,800	Jan 2004	Mar 2004
2004	Feb	\$63,100	\$4,500	\$63,100	Dec 2003	Feb 2004
2004	Jan	\$63,400	\$4,600	\$63,400	Nov 2003	Jan 2004
2003	Mean	\$60,500	\$4,000	\$60,500	Jan 2003	Dec 2003
2003	Dec	\$59,000	\$5,500	\$59,000	Sep 2003	Dec 2003
2003	Nov	\$58,200	\$4,900	\$58,200	Sep 2003	Nov 2003
2003	Oct	\$57,700	\$4,200	\$57,700	Aug 2003	Oct 2003
2003	Sep	\$57,400	\$4,600	\$57,400	Aug 2003	Sep 2003
2003	Aug	\$61,800	\$2,000	\$61,800	May 2003	Aug 2003
2003	Jul	\$60,700	\$1,900	\$60,700	May 2003	May 2003

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2003	Jun	\$62,400	\$3,400	\$62,400	Apr 2003	May 2003
2003	May	\$62,000	\$3,500	\$62,000	Mar 2003	May 2003
2003	Apr	\$61,800	\$4,600	\$61,800	Feb 2003	Apr 2003
2003	Mar	\$58,000	\$1,400	\$58,000	Jan 2003	Mar 2003
2003	Feb	\$59,400	\$2,900	\$59,400	Dec 2002	Feb 2003
2003	Jan	\$61,600	\$11,400	\$61,600	May 2002	Jan 2003
2002	Mean	\$69,800	\$9,400	\$69,800	Mar 2002	Dec 2002
2002	Dec	\$68,400	\$15,300	\$68,400	May 2002	Dec 2002
2002	Nov	\$68,800	\$15,200	\$68,800	May 2002	Oct 2002
2002	Oct	\$68,800	\$15,200	\$68,800	May 2002	Oct 2002
2002	Sep	\$73,800	\$8,700	\$73,800	May 2002	May 2002
2002	Aug	\$73,800	\$8,700	\$73,800	May 2002	May 2002
2002	Jul	\$72,000	\$7,900	\$72,000	May 2002	May 2002
2002	Jun	\$72,000	\$7,000	\$72,000	Apr 2002	May 2002
2002	May	\$72,300	\$6,800	\$72,300	Mar 2002	May 2002
2002	Apr	\$72,800	\$4,700	\$72,800	Mar 2002	Apr 2002
2002	Mar	\$96,600	\$12,100	\$96,600	Jul 2001	Mar 2002
2002	Feb	\$102,600	\$2,500	\$102,600	Jul 2001	Sep 2001
2002	Jan	\$102,600	\$2,500	\$102,600	Jul 2001	Sep 2001
2001	Mean	\$100,800	\$6,100	\$100,800	Jan 2001	Sep 2001
2001	Dec	\$102,600	\$2,500	\$102,600	Jul 2001	Sep 2001
2001	Nov	\$102,600	\$2,500	\$102,600	Jul 2001	Sep 2001
2001	Oct	\$102,600	\$2,500	\$102,600	Jul 2001	Sep 2001
2001	Sep	\$101,400	\$3,400	\$101,400	Jul 2001	Sep 2001
2001	Aug	\$100,500	\$3,100	\$100,500	Jul 2001	Aug 2001
2001	Jul	\$100,400	\$6,900	\$100,400	May 2001	Jul 2001
2001	Jun	\$100,500	\$7,600	\$100,500	Apr 2001	May 2001
2001	May	\$100,200	\$6,900	\$100,200	Mar 2001	May 2001
2001	Apr	\$98,600	\$3,800	\$98,600	Mar 2001	Apr 2001
2001	Mar	\$100,800	\$4,400	\$100,800	Jan 2001	Mar 2001

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
2001	Feb	\$98,400	\$10,500	\$98,400	Oct 2000	Jan 2001
2001	Jan	\$98,400	\$10,500	\$98,400	Oct 2000	Jan 2001
2000	Mean	\$107,000	\$7,800	\$107,000	Jan 2000	Dec 2000
2000	Dec	\$100,300	\$12,100	\$100,300	Jul 2000	Dec 2000
2000	Nov	\$113,800	\$3,700	\$113,800	Jun 2000	Oct 2000
2000	Oct	\$113,800	\$3,700	\$113,800	Jun 2000	Oct 2000
2000	Sep	\$115,100	\$2,100	\$115,100	May 2000	Jul 2000
2000	Aug	\$115,100	\$2,100	\$115,100	May 2000	Jul 2000
2000	Jul	\$111,800	\$5,000	\$111,800	May 2000	Jul 2000
2000	Jun	\$109,000	\$6,500	\$109,000	Apr 2000	Jun 2000
2000	May	\$108,000	\$5,500	\$108,000	Mar 2000	May 2000
2000	Apr	\$106,100	\$5,000	\$106,100	Feb 2000	Apr 2000
2000	Mar	\$106,100	\$3,300	\$106,100	Jan 2000	Mar 2000
2000	Feb	\$105,200	\$3,900	\$105,200	Dec 1999	Feb 2000
2000	Jan	\$108,800	\$4,100	\$108,800	Oct 1999	Jan 2000
1999	Mean	\$101,300	\$11,800	\$101,300	Feb 1999	Dec 1999
1999	Dec	\$107,600	\$6,200	\$107,600	Oct 1999	Dec 1999
1999	Nov	\$106,000	\$6,100	\$106,000	Sep 1999	Nov 1999
1999	Oct	\$104,600	\$6,000	\$104,600	Sep 1999	Oct 1999
1999	Sep	\$98,400	\$7,100	\$98,400	Jul 1999	Sep 1999
1999	Aug	\$93,900	\$2,300	\$93,900	Jun 1999	Jul 1999
1999	Jul	\$94,200	\$3,500	\$94,200	May 1999	Jul 1999
1999	Jun	\$96,900	\$6,100	\$96,900	Apr 1999	Jun 1999
1999	May	\$101,500	\$15,100	\$101,500	Mar 1999	May 1999
1999	Apr	\$106,500	\$16,800	\$106,500	Feb 1999	Apr 1999
1999	Mar	\$118,600	\$21,200	\$118,600	Dec 1998	Mar 1999
1999	Feb	\$113,200	\$15,700	\$113,200	Nov 1998	Feb 1999
1999	Jan	\$123,800	\$17,800	\$123,800	Jul 1998	Dec 1998
1998	Mean	\$132,000	\$14,000	\$132,000	Jan 1998	Dec 1998
1998	Dec	\$123,800	\$17,800	\$123,800	Jul 1998	Dec 1998

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1998	Nov	\$133,300	\$27,800	\$133,300	Jun 1998	Nov 1998
1998	Oct	\$130,900	\$28,900	\$130,900	Jun 1998	Oct 1998
1998	Sep	\$129,500	\$28,400	\$129,500	Jun 1998	Jul 1998
1998	Aug	\$129,500	\$28,400	\$129,500	Jun 1998	Jul 1998
1998	Jul	\$127,900	\$18,200	\$127,900	May 1998	Jul 1998
1998	Jun	\$133,900	\$13,500	\$133,900	Apr 1998	Jun 1998
1998	May	\$133,400	\$8,200	\$133,400	Mar 1998	May 1998
1998	Apr	\$137,900	\$3,600	\$137,900	Feb 1998	Apr 1998
1998	Mar	\$132,800	\$11,000	\$132,800	Jan 1998	Mar 1998
1998	Feb	\$134,200	\$13,900	\$134,200	Nov 1997	Feb 1998
1998	Jan	\$135,900	\$16,800	\$135,900	Nov 1997	Jan 1998
1997	Mean	\$131,200	\$15,000	\$131,200	Jan 1997	Dec 1997
1997	Dec	\$143,300	\$7,400	\$143,300	Jun 1997	Dec 1997
1997	Nov	\$143,100	\$7,600	\$143,100	May 1997	Nov 1997
1997	Oct	\$118,900	\$20,200	\$118,900	May 1997	Jun 1997
1997	Sep	\$118,900	\$20,200	\$118,900	May 1997	Jun 1997
1997	Aug	\$118,900	\$20,200	\$118,900	May 1997	Jun 1997
1997	Jul	\$132,200	\$19,500	\$132,200	May 1997	Jun 1997
1997	Jun	\$131,000	\$16,000	\$131,000	Apr 1997	Jun 1997
1997	May	\$130,700	\$16,000	\$130,700	Mar 1997	May 1997
1997	Apr	\$129,400	\$7,600	\$129,400	Feb 1997	Apr 1997
1997	Mar	\$124,400	\$9,200	\$124,400	Jan 1997	Mar 1997
1997	Feb	\$118,900	\$10,200	\$118,900	Dec 1996	Feb 1997
1997	Jan	\$114,500	\$6,600	\$114,500	Nov 1996	Jan 1997
1996	Mean	\$118,100	\$11,800	\$118,100	Jan 1996	Dec 1996
1996	Dec	\$115,600	\$5,500	\$115,600	Oct 1996	Dec 1996
1996	Nov	\$119,700	\$1,000	\$119,700	Sep 1996	Nov 1996
1996	Oct	\$111,300	\$8,200	\$111,300	Jul 1996	Oct 1996
1996	Sep	\$112,600	\$7,800	\$112,600	Jul 1996	Sep 1996
1996	Aug	\$111,100	\$8,000	\$111,100	Jul 1996	Aug 1996

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1996	Jul	\$113,600	\$12,100	\$113,600	May 1996	Jul 1996
1996	Jun	\$118,100	\$16,300	\$118,100	Apr 1996	May 1996
1996	May	\$119,200	\$14,900	\$119,200	Mar 1996	May 1996
1996	Apr	\$127,600	\$13,000	\$127,600	Feb 1996	Apr 1996
1996	Mar	\$125,000	\$6,900	\$125,000	Jan 1996	Mar 1996
1996	Feb	\$125,600	\$7,600	\$125,600	Jan 1996	Feb 1996
1996	Jan	\$135,700	\$15,100	\$135,700	Jul 1995	Jan 1996
1995	Mean	\$134,200	\$12,300	\$134,200	Feb 1995	Oct 1995
1995	Dec	\$146,600	\$8,400	\$146,600	May 1995	Oct 1995
1995	Nov	\$146,600	\$8,400	\$146,600	May 1995	Oct 1995
1995	Oct	\$146,600	\$8,400	\$146,600	May 1995	Oct 1995
1995	Sep	\$146,600	\$8,400	\$146,600	May 1995	Jul 1995
1995	Aug	\$146,600	\$8,400	\$146,600	May 1995	Jul 1995
1995	Jul	\$146,900	\$10,500	\$146,900	May 1995	Jul 1995
1995	Jun	\$137,100	\$11,600	\$137,100	Apr 1995	Jun 1995
1995	May	\$133,900	\$12,100	\$133,900	Mar 1995	May 1995
1995	Apr	\$128,500	\$8,000	\$128,500	Feb 1995	Apr 1995
1995	Mar	\$122,700	\$2,900	\$122,700	Feb 1995	Mar 1995
1995	Feb	\$123,100	\$1,700	\$123,100	Nov 1994	Feb 1995
1995	Jan	\$122,000	\$5,200	\$122,000	Oct 1994	Dec 1994
1994	Mean	\$135,600	\$24,800	\$135,600	Feb 1994	Dec 1994
1994	Dec	\$122,000	\$5,200	\$122,000	Oct 1994	Dec 1994
1994	Nov	\$114,100	\$12,400	\$114,100	Sep 1994	Nov 1994
1994	Oct	\$109,800	\$12,100	\$109,800	Jul 1994	Oct 1994
1994	Sep	\$110,300	\$12,200	\$110,300	Jul 1994	Sep 1994
1994	Aug	\$130,300	\$19,600	\$130,300	Jun 1994	Aug 1994
1994	Jul	\$143,400	\$31,800	\$143,400	May 1994	Jul 1994
1994	Jun	\$151,100	\$25,200	\$151,100	Apr 1994	Jun 1994
1994	May	\$148,700	\$27,300	\$148,700	Mar 1994	May 1994
1994	Apr	\$145,400	\$9,600	\$145,400	Feb 1994	Apr 1994

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1994	Mar	\$158,400	\$14,600	\$158,400	Aug 1993	Mar 1994
1994	Feb	\$175,500	\$20,700	\$175,500	Jul 1993	Feb 1994
1994	Jan	\$202,200	\$13,000	\$202,200	Jun 1993	Aug 1993
1993	Mean	\$213,300	\$17,500	\$213,300	Jan 1993	Aug 1993
1993	Dec	\$202,200	\$13,000	\$202,200	Jun 1993	Aug 1993
1993	Nov	\$202,200	\$13,000	\$202,200	Jun 1993	Aug 1993
1993	Oct	\$202,200	\$13,000	\$202,200	Jun 1993	Aug 1993
1993	Sep	\$202,200	\$13,000	\$202,200	Jun 1993	Aug 1993
1993	Aug	\$202,200	\$13,000	\$202,200	Jun 1993	Aug 1993
1993	Jul	\$208,100	\$4,000	\$208,100	May 1993	Jul 1993
1993	Jun	\$210,500	\$14,900	\$210,500	Apr 1993	Jun 1993
1993	May	\$212,700	\$14,100	\$212,700	Mar 1993	May 1993
1993	Apr	\$215,400	\$14,200	\$215,400	Feb 1993	Apr 1993
1993	Mar	\$227,400	\$13,700	\$227,400	Jan 1993	Mar 1993
1993	Feb	\$231,800	\$11,700	\$231,800	Jun 1992	Feb 1993
1993	Jan	\$244,500	\$21,600	\$244,500	Jun 1992	Jan 1993
1992	Mean	\$219,100	\$29,800	\$219,100	Jan 1992	Jul 1992
1992	Dec	\$245,500	\$21,900	\$245,500	May 1992	Jul 1992
1992	Nov	\$245,500	\$21,900	\$245,500	May 1992	Jul 1992
1992	Oct	\$245,500	\$21,900	\$245,500	May 1992	Jul 1992
1992	Sep	\$245,500	\$21,900	\$245,500	May 1992	Jul 1992
1992	Aug	\$245,500	\$21,900	\$245,500	May 1992	Jul 1992
1992	Jul	\$241,500	\$19,600	\$241,500	May 1992	Jul 1992
1992	Jun	\$224,700	\$25,200	\$224,700	Apr 1992	Jun 1992
1992	May	\$212,300	\$18,300	\$212,300	Mar 1992	May 1992
1992	Apr	\$213,200	\$30,000	\$213,200	Feb 1992	Apr 1992
1992	Mar	\$213,300	\$33,100	\$213,300	Jan 1992	Mar 1992
1992	Feb	\$216,700	\$35,300	\$216,700	Dec 1991	Feb 1992
1992	Jan	\$204,100	\$7,000	\$204,100	Nov 1991	Jan 1992
1991	Mean	\$290,800	\$45,400	\$290,800	Jan 1991	Dec 1991

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1991	Dec	\$208,000	\$4,900	\$208,000	Nov 1991	Dec 1991
1991	Nov	\$256,700	\$31,800	\$256,700	May 1991	Nov 1991
1991	Oct	\$282,400	\$30,400	\$282,400	May 1991	Jul 1991
1991	Sep	\$282,400	\$30,400	\$282,400	May 1991	Jul 1991
1991	Aug	\$282,400	\$30,400	\$282,400	May 1991	Jul 1991
1991	Jul	\$282,400	\$30,400	\$282,400	May 1991	Jul 1991
1991	Jun	\$310,200	\$16,900	\$310,200	Apr 1991	May 1991
1991	May	\$312,200	\$16,200	\$312,200	Mar 1991	May 1991
1991	Apr	\$318,800	\$11,700	\$318,800	Feb 1991	Apr 1991
1991	Mar	\$317,900	\$12,000	\$317,900	Jan 1991	Mar 1991
1991	Feb	\$328,900	\$11,900	\$328,900	Dec 1990	Feb 1991
1991	Jan	\$348,700	\$35,800	\$348,700	Nov 1990	Jan 1991
1990	Mean	\$380,400	\$33,600	\$380,400	Jan 1990	Dec 1990
1990	Dec	\$353,500	\$30,400	\$353,500	Oct 1990	Dec 1990
1990	Nov	\$364,900	\$38,100	\$364,900	Oct 1990	Nov 1990
1990	Oct	\$359,900	\$24,300	\$359,900	Jun 1990	Oct 1990
1990	Sep	\$389,400	\$34,900	\$389,400	Jun 1990	Aug 1990
1990	Aug	\$389,400	\$34,900	\$389,400	Jun 1990	Aug 1990
1990	Jul	\$404,500	\$16,400	\$404,500	May 1990	Jun 1990
1990	Jun	\$399,500	\$17,900	\$399,500	Apr 1990	Jun 1990
1990	May	\$401,400	\$19,500	\$401,400	Mar 1990	May 1990
1990	Apr	\$404,200	\$17,800	\$404,200	Feb 1990	Apr 1990
1990	Mar	\$398,600	\$22,200	\$398,600	Jan 1990	Mar 1990
1990	Feb	\$394,400	\$20,600	\$394,400	Nov 1989	Feb 1990
1990	Jan	\$388,300	\$21,100	\$388,300	Nov 1989	Jan 1990
1989	Mean	\$367,100	\$60,400	\$367,100	Jan 1989	Nov 1989
1989	Dec	\$385,000	\$31,100	\$385,000	May 1989	Nov 1989
1989	Nov	\$385,000	\$31,100	\$385,000	May 1989	Nov 1989
1989	Oct	\$380,600	\$27,900	\$380,600	May 1989	Jun 1989
1989	Sep	\$380,600	\$27,900	\$380,600	May 1989	Jun 1989

Year	Month	Estimated Time-Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1989	Aug	\$380,600	\$27,900	\$380,600	May 1989	Jun 1989
1989	Jul	\$352,100	\$62,300	\$352,100	May 1989	Jun 1989
1989	Jun	\$360,300	\$59,800	\$360,300	Apr 1989	Jun 1989
1989	May	\$368,100	\$65,200	\$368,100	Mar 1989	May 1989
1989	Apr	\$390,000	\$53,400	\$390,000	Mar 1989	Apr 1989
1989	Mar	\$356,200	\$89,300	\$356,200	Dec 1988	Mar 1989
1989	Feb	\$305,700	\$85,700	\$305,700	Nov 1988	Jan 1989
1989	Jan	\$304,900	\$76,700	\$304,900	Nov 1988	Jan 1989
1988	Mean	\$200,200	\$47,100	\$200,200	Jan 1988	Dec 1988
1988	Dec	\$305,100	\$85,700	\$305,100	Nov 1988	Dec 1988
1988	Nov	\$242,700	\$35,300	\$242,700	Jun 1988	Nov 1988
1988	Oct	\$218,500	\$5,400	\$218,500	May 1988	Aug 1988
1988	Sep	\$218,500	\$5,400	\$218,500	May 1988	Aug 1988
1988	Aug	\$218,500	\$5,400	\$218,500	May 1988	Aug 1988
1988	Jul	\$197,400	\$30,500	\$197,400	May 1988	Jun 1988
1988	Jun	\$193,800	\$30,400	\$193,800	Apr 1988	Jun 1988
1988	May	\$192,700	\$30,000	\$192,700	Mar 1988	May 1988
1988	Apr	\$188,300	\$28,100	\$188,300	Feb 1988	Apr 1988
1988	Mar	\$184,600	\$20,600	\$184,600	Jan 1988	Mar 1988
1988	Feb	\$180,900	\$17,000	\$180,900	Dec 1987	Feb 1988
1988	Jan	\$179,200	\$10,300	\$179,200	Nov 1987	Jan 1988
1987	Mean	\$169,800	\$13,300	\$169,800	Jan 1987	Dec 1987
1987	Dec	\$174,500	\$10,400	\$174,500	Sep 1987	Dec 1987
1987	Nov	\$168,000	\$5,200	\$168,000	Sep 1987	Nov 1987
1987	Oct	\$169,600	\$6,500	\$169,600	Aug 1987	Sep 1987
1987	Sep	\$169,600	\$6,500	\$169,600	Aug 1987	Sep 1987
1987	Aug	\$174,000	\$6,600	\$174,000	Jun 1987	Aug 1987
1987	Jul	\$176,800	\$7,300	\$176,800	May 1987	Jun 1987
1987	Jun	\$170,600	\$14,400	\$170,600	Apr 1987	Jun 1987
1987	May	\$169,600	\$14,500	\$169,600	Mar 1987	May 1987

Year	Month	Estimated Time- Weighted Value	Standard Deviation	Estimated Unweighted Value	Earliest Transaction	Latest Transaction
1987	Apr	\$164,300	\$16,000	\$164,300	Feb 1987	Apr 1987
1987	Mar	\$162,700	\$12,100	\$162,700	Jan 1987	Mar 1987
1987	Feb	\$161,900	\$11,900	\$161,900	Dec 1986	Feb 1987
1987	Jan	\$165,600	\$8,200	\$165,600	Dec 1986	Jan 1987

Submitted by: Kiley Burton

Community of Residence: Cordova

Comment:

I oppose proposals 51,52, and 53

Dear Board of Fish, I am a 19-year-old NVE tribal member and year-round resident of Cordova. Last year I bought a Copper River drift permit and boat. I am the youngest tribal member permit holder in the fleet and this is my main source of income and my way of life.

These proposals do not make any sense. There is a large amount of overlap in when the different salmon stocks enter the river and make it past the sonar. Depending on temperature and water levels it can take over a week for the salmon to get past the upper markers to the sonar. During any given time there can be over half a million salmon in this staging area. This doesn't account for our delta stocks that do not go past the sonar.

This proposed 2-week closure is not going to accomplish more biodiversity of our stocks. My family has been fishing this river for over 100 years and if we were going to have biodiversity issues it would have already happened.

This would hurt me financially.

Submitted by: Charlie Busby

Community of Residence: Anchorage

Comment:

Good Day, I am a personal use fisherman in the lower Copper River. I use a guided power boat to access the fishery. I am 66 years old and a 100% disabled Combat Veteran., I can no longer scale the cliffs to access fishing with my dipnet. Since Ahtna no longer allows me to access easier area without paying a daily fee, that often the fish are not at, I use a guided power boat. I am feeding myself and my wife an 2 grandchildren. Since I can no longer work the fish I catch at Copper River personal use help tto feed my family. I oppose proposals 44, 45, 46, 47, 48, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, & 72. I support48, 58, 59, 70. If it wasn't for the use of a guided power boat I would not be able to harvest mySalmon. I think the present limits for Kings and other salmon are fair and equitable. Yes I save up my dollars to afford a guided power boat and there is no guarantee of success but, what I save at the grocery store allows me to afford it.

Submitted by: Wade buscher

Community of Residence: Cordova

Comment:

Prop 45) I oppose this proposal, opening the inside Chinook closure area to subsistence fishing would result in increased King Salmon harvest. Many commercial fishermen would change gear to utilize the Saturday subsistence openers to target King salmon and thus put more pressure on the already decreasing King salmon resource.

Prop 46,47) I support these proposals, It makes sense to gather any and all salmon harvest data in a timely manner which could be useful in managing the resource for all user groups

Prop 51,52,53) I oppose these proposals, these proposals would have a direct effect on my livelihood as a commercial fisherman. We benefit greatly from the value of these early run Sockeye and King salmon in the marketplace. Run size and timing is dynamic, we should not be constrained solely by the Miles Lake sonar count.

Prop 56,57) I oppose these proposals, gillnet stacking should not be applied to the Area E gillnet fishery

Prop70) I oppose

Prop78) I oppose

Submitted by: Barren Cabana

Community of Residence: Girdwood

Comment:

73,74,75,76,77,78

Submitted by: Jeff Cabana

Community of Residence: Homer, AK

Comment:

Proposal #73 and 74: I SUPPORT permit stacking. These proposal would both benefit permit stacking . This would alleviate requirements for having multiple permit holders on each vessel.

Proposal #75 and 76: I OPPOSE . The allocation plan should remain the same. It's a successful balance between to the user groups as it stands and fairly represents all groups.

Proposal # 77: I OPPOSE. As it stands currently , I feel PWSAC and its included entities is appropriate for PWSAC management of the fisheries. To bring Valdez into the PWSAC Core Report a very individualized fishery, would complicate the overall seine fishery for all involved.

Proposal #78: I OPPOSE. I feel that a 25% decrease in all hatchery egg take in PWS is not justified . There is no evidence of benefit for the good of the sustainable fishery that I am aware of .

Submitted by: Jennifer Cabana

Community of Residence: Homer

Comment:

I support prop 73 and 74 and the ability to stack them on a vessel. This will limit the load on the process for emergency transfers if one permit holder is unable to be on the vessel.

Submitted by: Jeremy Cabana

Community of Residence: Valdez

Comment:

See attached.

Submitted by: Jeremy Cabana

Community of Residence: Homer

Comment:

Prop. 1

I agree

Seems like a good idea.

Prop 16

I agree

Seems like a good idea

Prop 17

I agree

Seems like a good idea

Prop 25

I agree

Seems like a reasonable idea

Prop 26

I agree

Seems like a good idea

Prop 31

I agree

Seems like a good idea

Prop 36

I oppose

It's a bad idea

Prop 37

I agree

A good idea

Prop 39

I oppose

A terrible idea

Prop 40

I oppose

It's a poor idea

Prop 42

I agree

It's a good idea

Prop 44

I oppose

Bad idea

Prop 47

I oppose

Bad idea

Prop 56

I oppose

it is a poor idea

Prop 57

I oppose

It's a bad idea

Prop 73

I oppose

It's a bad idea

Prop 74

I oppose

It's a bad idea

Prop 75

I oppose it

It's a bad idea

Prop 76

I oppose

It's a bad idea

Prop 77

I oppose

This is a terrible idea

Prop 78

I vehemently oppose

This idea would be the downfall of the entire system that so many people rely upon for their survival. Terrible idea and is the work of the devil.

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 purse seine fisherman. Alaskan salmon hatcheries have allowed me to support my family. The last two years have been incredibly difficult due to low prices, and this year has been especially tough with a complete run failure. The loss of hatchery production would probably make it even more devastating.

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,

Jeremy Cabana

[REDACTED]

Valdez, Alaska

Submitted by: Kannen Cabana

Community of Residence: Homer Alaska

Comment:

Im a Prince William Sound salmon seine permit holder and I support proposal 73 and support 74 for allowing the stacking of permits that would improve the fishery for the fisherman who desperately need it. Currently there are more boats than the fishery can support in the fleet by allowing the permit stacking it would mean less boats in the fleet.

I oppose proposal 75 and the plan should remain the same it works and it's been working.

I oppose proposal 76 the allocation plan works to keep balance between the seine and gill net user groups.

I oppose proposal 77 PWSAC and Valdez are two different districts and should not be included in PSWAC. The runs are different and shouldn't be lumped together.

I oppose proposal 78, a decrease by 25% egg take is not necessary and would be a negative impact on the fleet of fishing vessels.

Alaska Board of Fisheries members

I am in favor of proposals 73 and 74

These proposals essentially allow one person to own and operate two salmon purse seine permits on the same vessel in PWS. This is long overdue, when the limited permit system was adopted in 1973 there was considerable concern salmon fisheries would consolidate and be owned/controlled by investors or seafood processors. To insure the fisheries remained a viable enterprise for individual fishermen the limited permit program included language that restricted fishermen's ability to own and operate more than one salmon permit in any one area in a given year.

Much has changed since the mid 1970s, for example salmon prices for pinks are actually lower now than then, vessel prices have increased from about 50,000 dollars for an average salmon vessel to likely close to 750,000 for an average vessel, insurance, moorage, maintenance and all other cost associated with owning and operating a salmon boat.

Many factors that affect having a profitable salmon operation did not exist in the 1970s and 1980s. Salmon farms were in their infancy, RSW systems were very rare and quite undependable.

Fast forward to today and the average salmon fisherman finds it quite a challenge to provide a reasonable profit to provide for their families. There are simply too many boats trying to harvest salmon in every salmon fishery in Alaska. There have been attempts to reduce fleets in the past, SE salmon fishermen did a buy back for salmon purse seine permits. That reduced the number of permits but in the end there are still too many salmon boats there.

These proposals, 73 and 74 if passed likely result in a modest reduction in the number of boats fishing for salmon in the purse seine fishery. This would be a benefit to many people, less boats in the fishery, easier management for ADFG, less congestion in general for boats transiting PWS and the average boat would likely have a modestly higher gross earnings.

+Alaska Board of Fisheries Members

I oppose proposals 75 and 76, This proposal has been submitted to the BOF in essentially the same language for the last several PWS board cycles by the author of proposal 75. This proposal was proposal 11 and failed in the BOF meeting in 2014 by a vote of 0-7, in 2017 it was proposal 47 and failed by a vote of 0-7, in 2021 it was proposal 43 and failed by a vote of 0-6. It's important to note that the PWS salmon allocation plan was developed over 3 BOF cycles beginning in the late 1990s. Countless hours and committee meetings occurred over this several year period. The data that eventually established the 50-50 allocation split between the purse seine fleet and the drift gillnet fleet is based on the 20 year period before PWSAC was established in PWS. In the meetings, ideas of how to establish a fair working allocation were submitted and debated by all interested parties. The fundamental agreement was, develop a plan that was as simple as possible, brought parity to both gear groups over time and included only PWSAC produced salmon . The establishment of the five year rolling average and the “ triggers” set at 45% at Port Chalmers and Esther Island releases are deliberate and intend to achieve a 50-50 split over time. It is recognized there are vast harvest differences from year to year for both gear groups that is caused by both ex vessel price and run strength. This plan is not intended to achieve parity from year to year but over a long term period. For example, this proposal was submitted in the 2017 PWS BOF cycle. Using the available COAR harvest value data from 1984- 2016 (the COAR did not have digital records before 1984) the drift gillnet group was ahead of the purse seine fleet by \$ 125,402,807 dollars. Not a lot of harvest value has changed since the 2017 BOF meeting, the updated math using COAR harvest values from 1984 through 2022 the drift gillnet fleet is still 114 million dollars ahead of the seine fleet for PWSAC production harvest value. Proposal 75 limits the harvest value of PWSAC produced salmon to the years 2006 through 2022, PWSAC has been contributing harvest value to the drift gillnet and purse seine fleets since the late 1970s, it was relatively modest until the mid 1980s but did in fact exist. Again the primary reason I am using 1984-2022 is the COAR doesn't seem to have digital records before 1984. If the goal is to have an allocation plan that

achieves parity of harvest values over the long term we should use all the available data we can. Using 2006-2022 seems like an attempt to “cherry pick” data to reinforce this proposal.

Proposal 75 states we should use the harvest values “since inception in 2006”. PWSAC harvest contribution goes back much further than 2006. The proposal also request the trigger percentage for Port Chalmers be changed to 50% instead of the plans 45%. I’m not convinced this proposal is in the best interest of the drift gillnet fleet, if the BOF altered the allocation plan and actually used the 50% proposal and used PWSAC harvest values from 1984-2022, the drift gillnet fleet would be likely excluded from Port Chalmers for years. The purse seine fleet is actually currently behind the drift gillnet fleet by 114 million dollars of harvest value from 1984-2022. They are not complaining about this, the vast majority of both user groups know and accept there is going to be years where one group is ahead or behind, the goal of the allocation plan is to provide some near term financial relief to a user group by using the 5 year rolling average instead of using the overall harvest from 1984.

Fishery allocation plans have a long history of disappointed user groups, it is an impossible job to satisfy every person or user group when developing an allocation plan. The current PWS allocation plan was developed over a period of time that included 3 complete BOF cycles and had BOF appointed committee members for all those years. Much frustration and anger occurred in the years prior to the final adoption of the current plan in 2006. Many ideas and proposals were considered, some were adopted and some were not but they all were considered. The current plan is working, there is no reasonable reason to change it now. Both gear groups have had access to the piggy banks that are triggered by using the 5 year rolling averages. The harvest values from the COAR reports are accepted as correct and the math simply dictates which user group gets access to a piggy bank based on the 5 year rolling average.

Sincerely

Leroy L Cabana

Alaska Board of Fisheries Members

I oppose proposal 77, this proposal has been submitted every BOF PWS cycle for many years. It was included in the 2014 meeting as proposal 11, it failed 0-7. It was also submitted for the 2017 meeting as proposal 47, it also failed by a vote of 0-7, and in 2021 it was proposal 43 and failed by a vote of 0-6.

The PWS Allocation Plan was developed over three BOF cycles starting in the late 1990s, there was a process that included BOF members and committee members that worked on this for years. Mountains of paperwork and data were submitted and considered. The goal is to have a fair plan to allocate PWSAC produced salmon between the user groups.

Whis brings up the question, why just PWSAC and not all wild salmon or include VFDA. The answer to this was simple, fisherman from PWS started PWSAC, they represented both gear groups and wanted the salmon produced by PWSAC to benefit both gear groups. PWSAC can only plan and produce salmon that originate at their hatcheries, they have no influence on other salmon that return to PWS.

The only reason there is a need for an allocation plan is PWSAC produced salmon are the only salmon that can be shared by drift gillnet, set gillnet and purse seine fishermen. All other salmon return to areas that only allow either gill nets or purse seines. The hatchery VFDA, is located at the head of Valdez Arm. For all of history, only purse seines have been allowed to commercially harvest salmon in this area known as the Eastern district.

All of PWSAC hatcheries are located in the western side of PWS, Wally Norenberg, Main Bay and AFK are located about as far west as you can go. Cannery Creek is located in the western side of the Northern district and is a purse seine only area. There is a sockeye hatchery located up the Copper River area known as Gulkana which is drift gillnet only. There are only two areas in PWS that allow purse seines and drift gillnet in the same areas. One is Wally Norenberg located on the south side of Esther Island, this is the only area where mixed gear groups sometimes fish together. The other area is a

remote release on Montague at Port Chalmers, it is the “piggy bank” and is either drift gillnet or purse seine depending on the 5 year rolling average.

If PWSAC did not exist, there would be no practical reason to have an allocation plan as there are no other hatchery programs that would allow drift gillnet fishermen to participate or benefit.

In the last paragraph of proposal 77 it states “This proposal does not propose to reallocate VFDA produced salmon to other commercial salmon user groups”. This is flat out incorrect, If VFDA produced salmon are included in the overall harvest values the result would be a vast reduction in purse seine harvesting of PWSAC salmon. Essentially the vast majority of PWSAC salmon would be harvested by the drift gillnet fleet. The whole point of establishing PWSAC was so both user groups would benefit more or less equally from PWSAC production.

There is language in proposal 77 that suggest using state of Alaska borrowed funds somehow means that the drift gillnet fleet should have a benefit from using those funds. The state of Alaska loans money for countless reasons, some go to home buyers, small businesses, processors, all kinds of fishermen, agriculture and the list goes on. No reasonable person expects if they borrow state money, they have an obligation to other parties to assist them. You can not park in your neighbors garage just because they borrowed state money. It’s simply a lending agreement no different than a commercial bank. The money is borrowed for a set term and interest and paid back, no strings attached.

There are many references to allocation plans from Southeast Alaska, every allocation plan in Alaska develops their plan based on historic harvest and participation, they are all different. It’s impractical to adopt an allocation plan from Bristol Bay, Kodiak, area M or Southeast and apply it to PWS. There are different participation histories, geographical differences and harvest strategies. The PWS Allocation Plan was adopted using PWS history and participation.

Sincerely

Leroy Cabana

Submitted by: Russell Cabana

Community of Residence: Girdwood

Comment:

I strongly oppose proposals 75, 76,77, and 78. As a commercial fisherman and salmon seine permit holder for PWS, these proposals are completely unnecessary. Prop 75-77 is an attempt to change our management plan that has been working very well and fair for all users groups PWS. Those proposals are very one sided and are only intended to benefit one user group, and would have huge economic hardships for other user groups. I strongly oppose prop 78 as it will only hurt economically to all of the communities surrounding PWS. Also Prop 78 has been opposed at every meeting throughout the state for years and has wasted a lot of time and resources from many different groups as well as individuals trying to keep our way of life.

Thanks.

November 24, 2024

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

Dear Board of Fisheries,

I am from Girdwood, Alaska, and I participate in Alaska's salmon fisheries through commercial fishing, sport fishing, public use, subsistence, and processing. I've commercially fished my entire life in PWS, and the hatcheries have made it possible to keep me in business and provide a great quality of life in the community where I currently live and grew up. It's already hard enough for commercial fishermen, as fishing is unpredictable and dealing with Mother Nature involves too many variables to predict how each season will go. So, why mess with people's way of life and risk economic losses to our communities?

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



Girdwood, Alaska

Proposal 73 and 74: [Support](#). Permit stacking is pragmatic and a forward-thinking approach. It promotes fewer vessels and it turn balances economic efficiency, sustainability, and community interests.

Proposal 75: [Oppose](#). The current allocation plan has worked and should remain the same. I see no reason to amend it.

Proposal 76: [Oppose](#). The current allocation plan has worked well to balance Port Chalmers between both user groups and should remain the same.

Proposal 77: [Oppose](#). PWSAC and Valdez are two different districts and should not be included into PWSAC.

Proposal 78: [Oppose](#). The commercial fishing industry already operates on slim profit margins. Reducing the egg take by 25% would lower fish returns, increase competition among fishermen, driving up costs per unit of harvested fish (e.g., fuel, equipment, and labor costs) while reducing overall income. Smaller harvests could push many fishermen, especially the younger generation just getting started, to the brink of financial insolvency. Studies on hatchery-released pink salmon in PWS have not definitively proven significant adverse effects on wild stocks or ecosystems. Reducing egg take by 25% would likely have little ecological benefit but severe economic repercussions.

Proposal 79: [Support](#). Completing cost recovery in Main Bay has always been more difficult when sport boats are present. If Main Bay was closed for cost recovery it would allow it to be done more efficiently and take less time overall therefor allowing uninterrupted access for sport fisherman once complete.

Tayla Cabana

November 26, 2024

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

Dear Members of the Board of Fisheries,

I am writing to express my opposition to Proposal 78. I have participated in Alaska's salmon fisheries for 50 years, fishing many different fisheries in Prince William Sound and other parts of Alaska. Alaska's salmon hatcheries have greatly benefited me, as my extended family relies on the stability, proper management, and health of these fisheries.

All proposals should be able to demonstrate how they will not harm our fisheries or economy. Proposals 75 through 78 do not meet this standard. These are old proposals from the same groups that seek to change well-established, well-thought-out, and highly successful policies. Please do not allow these proposals to destroy our fisheries.

Please review the following reason 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.

Sincerely,

Tim Cabana


Girdwood & Whittier, Alaska

PC106

Submitted by: Larry Cabana , PWS permit holder

Community of Residence: HOMER

Comment:

73 74 75 76 77 78 79 80 81 82 83 56 57 marked as below

PC107

Submitted by: Stephen Camp

Community of Residence: Homer

Comment:

Bottom trawling must be stopped. Salmon, crab and marine species are disappearing and local residents are not able to fish for subsistence. Once the resources are gone they are gone. This practice has ruined many other parts of the world and the management team has not paid any attention to their data or ours. We need to replace board members with people that are not subsidized by the processors.

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 subsistence fisherman, commercial fisherman, and sport fisherman. Hatcheries are an important component of Alaska's salmon fisheries. They help provide subsistence, commercial and sport fishing opportunities. Without hatcheries Alaska's salmon fisheries would be less robust than they are today, providing fewer opportunities to feed the world. Proposal 78 would negatively impact Prince William Sound. This would negatively impact both economic wellbeing and food security in the region.

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 Campbell



Sitka, 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 40 year permit holder. I have fished salmon since I was a child. I was raised in Cordova.

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,

Norman Campbell

A black rectangular redaction box covering the signature of Norman Campbell.

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

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

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

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

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

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

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

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

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

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

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

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

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

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

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

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 been Drift Gillnetting Area E since 1969.

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,

Kenneth Carlson

A solid black rectangular box used to redact the signature of Kenneth Carlson.

Anchorage

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

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

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

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

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

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

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

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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

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. I participate in Alaska's salmon fisheries through commercial fishing, and seining is all I have ever done. It's the way I grew up, just like my father and grandfather before me. It's all I've ever known, and I don't know what I would do if I couldn't support my family through this work. This is what I've dedicated my entire life to, putting everything I have into it. It's already extremely competitive for the fish each year, and reducing hatchery production would be a huge hit to my family business.

Sincerely,
Tor Carlson



Cordova/Valdez, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I participate in Alaska's salmon fisheries through commercial fishing, and seining is all I have ever done. It's the way I grew up, just like my father and grandfather before me. It's all I've ever known, and I don't know what I would do if I couldn't support my family through this work. This is what I've dedicated my entire life to, putting everything I have into it. It's already extremely competitive for the fish each year, and reducing hatchery production would be a huge hit to my family 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,

Tor Carlson



Cordova & Valdez, Alaska

Submitted by: Danny Carpenter

Community of Residence: Cordova, Alaska

Comment:

See Attached [Boards Support note: commenter did not include an attachment]

November 26, 2024

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

Dear Members of the Board of Fisheries,

I am the owner and operator of an Area E commercial drift gillnet operation. Alaska's salmon hatcheries have a direct impact on my economic well being. As a commercial fisherman the amount of money we make directly correlates to our harvest of product. The ocean and the hatcheries help with the sowing, and myself, I primarily do the reaping. The hatcheries help supplement the wild stock runs that we also harvest and help to spread the fleet out and create a greater amount of economic opportunity for fishermen and their communities.

If the egg take decreases by 25% we are going to see fewer returning fish in western Prince William Sound for harvest by all user groups. It is going to mean fewer fish in my freezer and less loot in the bank account. There will be more seasons where the hatcheries only exist to pay for themselves and not for their original intention which was to create economic opportunity in the Sound.

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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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.

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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,

Eric Carpenter



King Cove, Alaska

Marc Carrel
F/V Silver Moon
[REDACTED]
Cordova, AK [REDACTED]

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 20, 2024

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

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

As a member of the board of Cordova District Fishermen United (CDFU) and as their groundfish division co-chair, I have participated in writing the comments of CDFU. I support CDFU's positions and rationales and will not repeat those in this letter. The intent of this letter is to make my personal comments on allocative board proposals that CDFU cannot weigh in on. These comments are my personal opinion as a Cordova based commercial fisherman only.

Proposals 56 and 57: Oppose

I oppose proposals 56 and 57 because adding 50 fathoms of gillnet gear in the Prince William Sound fishery would create too much of an advantage for dual permit holders, thereby forcing fishermen to purchase a second permit in order to remain competitive. This would increase operating costs for fishermen already in the fishery and make it harder for new fishermen to gain entry.

While permit stacking has been popular in Bristol Bay, the Prince William Sound fishery is different. The Bristol Bay fishery is mostly offshore and often so high paced that the extra 50 fathoms don't always provide an advantage when turning over the net quickly is the priority.

On the Copper River and in Prince William Sound, on the other hand, an extra 50 fathoms of gear would be a major advantage. Much of the Copper River fishery is slow paced and 30% more net could easily equate to 30% more fish during long fishing periods. After the inside of the Copper River district is open, or during Coho season, an extra 50 fathoms of gear would allow fishermen to close off entire sand channels that were too wide for that before. In Prince William Sound, where fishermen often fish off the beach or off rock points, the extra 50 fathoms of gear

could very effectively cut off any fishermen with standard sized nets from catching fish. Set net sites in particular could be cut off in ways that they never were before. For those reasons, the extra 50 fathoms would create a much bigger income division between single permit holders and dual permit holders than intended and thereby also significantly increase barriers to entry into the fishery.

Both proposals 56 and 57 were written to allow one person to own and operate two permits. I fundamentally do not agree with this concept. Wealthier fishermen will purchase a second permit while young new entrants to the fishery will be disadvantaged behind the longer nets. With no provision to require the second permit to be in the name of a second person, permit stacking will only eliminate jobs and make it harder for people to buy into the fishery. At this point, the Prince William Sound drift gillnet fishery is the only entry level fishery available for residents of Cordova and therefore needs to remain accessible.

Proposal 73 and 74: Oppose

I am opposed to one person being able to own and operate two state permits for the same fishery. The original intent of limited entry was both to limit the number of fishermen and vessels participating in fisheries, *as well as* to prevent the consolidation of fisheries in the hands of a few. Limiting one permit of a fishery to one owner keeps more jobs in the fleet.

Proposal 75: Support

The original intent of the enhanced salmon allocation plan was to create parity in the revenues of the gillnet and seine fleets. However, since the allocation plan has been in effect, the gillnet fleet has continuously been disadvantaged. From 2006 through 2022, the drift gillnet fleet has been behind the seine fleet in revenue by \$65.4 Million. Changing the trigger points from 45% to 50% and making the Port Chalmers subdistrict the only equalizer would help create parity between the fleets.

Furthermore, replacing the 5 year average with a running average since the beginning of the allocation plan is a better approach because it can include disaster relief payments that arrive many years late.

Proposal 76: Support

This proposal is nearly identical to proposal 75 but keeps the 5 year rolling average in place. I support this for the same reasons as listed above, but do believe that replacing the 5 year rolling average with a long term average is the better approach.

In both proposal 75 and 76, I support removing the Esther subdistrict as an equalizer. Loosing the Esther subdistrict would leave the gillnet fleet with access to one major hatchery run only, while the seine fleet would have access to four different hatchery runs in addition to the remote release site at Port Chalmers. This is unfair and against the original intent of the allocation plan. The Port Chalmers subdistrict should be the only equalizer.

Proposal 77: Support

The gillnet fleet is far behind the seine fleet in overall income, and including VFDA in the allocation plan would help get us back to revenue equality between the fleets as originally intended in the allocation plan.

Thank you for your time in considering the proposals before you.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Carrel", is enclosed within a thin black rectangular border.

Marc Carrel
F/V Silver Moon

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 purse seiner in Prince William Sound. Seining has been my primary source of income most of my life and was the same for my dad and grandfather. This proposal would have a negative impact. Fishing is already a very expensive and high risk industry where typically all the financial responsibilities are put on one person. A lot of people have payments to make and this would make it even more difficult, especially for younger fishermen such as myself.

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,

Joel Carroll

A solid black rectangular box used to redact the signature of Joel Carroll.

Homer, Alaska

Submitted by: Stephanie Carroll

Community of Residence: Homer

Comment:

I am opposed to proposal 78. Once again hatcheries are under attack and so once again I am writing to ask you to please support our hatcheries and reject this proposal. The claim that hatcheries are a threat to wild fish is just not based on good science. In fact PWS has had record wild fish years multiple times since the introduction of hatcheries. The decline in king salmon is much more likely to be caused by intercept and by-catch. It is very difficult to determine the actual cause. What is not difficult to see is the economic impact that a reduction would have to our fishermen and our fishing communities. Salmon hatcheries provide jobs in the commercial sector as well as the recreational opportunities it supports. Indirectly it also provides a boost to the communities where the fishermen work and live, buy their groceries and do their repairs. In our current economic climate it seems irresponsible to make such a big cut to our livelihood based on little to no evidence. Thank you

My name is Weston Carroll. I grew up in a fishing family and fished with my father in PWS in the late 80's and early 90's. I started running my own boat in 1997 and last summer was the first summer my son started running his own boat in PWS as well.

Proposal 78 – I oppose this proposal. There is no conclusive scientific evidence to justify this proposal

Proposals 75, 76, 77 - I oppose these proposals. They are a one-sided attempt to shift more of the allocation to the drift gillnet fleet and take away from the seine fleet.

Proposal 78 – This proposal is yet another attempt to reduce hatchery production. Hatcheries play a vital role in our Alaskan salmon industry. The hatchery production is a significant part of our commercial catch most years. The hatchery production also has significant economic impacts for the fishing communities around the state. The hatchery production also provides for sport fishing opportunity, an example of this would be the youth pink salmon derby that takes place every summer in Valdez. This proposal argues that hatchery production has had negative effects on King Salmon stocks in the Yukon River. The science backing these claims is weak and inconclusive and the science lists other factors that could potentially have far more significant impact on King Salmon stocks than hatchery production from PWS area. Please oppose this proposal. Don't sacrifice our livelihood when there is so little evidence supporting any direct correlation to the decline in King Salmon.

Proposals 75, 76, 77 - These 3 proposals are a one-sided attempt to reduce fishing opportunity for the seine fleet and give more fishing opportunity to the drift gillnet fleet. The allocation plan has been in place for many years and I feel that unbiased and more thorough research would need to be completed and presented before making any changes to the current allocation plan. Here is one example of why I feel proposal 77 is one sided in their argument. They are arguing that the VFDA hatchery should be included in the PWS allocation plan. They reference AAC 33.364 as an argument that in the Southeast region all hatcheries are included and reference the statement that "stated goals are to provide fair and reasonable allocation of the harvest of enhanced salmon". So, I looked up AAC 33.364 and it also states that the goal of fair allocation is 44-49% for Seine and 24-29% for drift gillnet. It is one-sided to use the parts of AAC 33.364 to benefit their argument but leave out the fact that in Southeast the target goal is for seine fleet to get nearly 2 times the allocation of drift gillnet.

Thank you for reading my comments

Weston Carroll

F/V Amber Dawn

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

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Carmel Carty McCarthy, I live in Kodiak and am a mom to 7 kids ranging in age from 15 to 34. I inherited a commercial fishing business, which my husband Peter and I started in 2003. Unfortunately due to brain cancer in 2016, he was forced to step out and I stepped in. Having found myself a widow and single parent of young kids, skippering our vessel wasn't an option. I lacked the skill, knowledge and confidence to walk into a wheelhouse and do what needed to be done. I've been blessed to have an exceptional fisherman step up to not only skipper my Trawler, but to be an advisor, confidant and in so many ways a partner in my business.

Peter, my late husband, fished and tendered Alaska waters from Prince William Sound to Kodiak, Akutan to Port Moller, from his arrival to Kodiak in 1989 until his death in 2016. In 2008 we bought the F/V Stella, a 58 foot vessel and converted her to a trawler. In 2013 we sponsored her from 24ft to 32ft wide, making her one of the first of her kind in Alaska and one of the infamous Super 8's. With the size of the F/V Stella, since 2013 we have been able to participate in various trawl fisheries that in years prior we were unable to do, one of these being the PWS pollock fishery.

PWS Pollock Fishery is an extremely important component to my business. For my crew, all Kodiak family fishermen and women, it is usually the first paycheck we receive in sometimes more than 3 months. Obviously, weather is a contentious factor in all Alaskan fishing operations, and for its part we were unable to get to the Sound this year, and have consequently spent all year trying to recoup the loss, to no avail. The income generated from the Pollock sound fishery along with 620 and 630 has in the past allowed us to pay our crew and schedule maintenance and capital improvement projects. This year, with the seafood industry in crisis, exorbitant fuel prices and unrealistic ex-vessel prices, virtually every small vessel business is suffering, including mine.

In our experience the Pollock fishery in PWS is a fairly intensive management structure. It requires constant contact between my skipper and the managers even before leaving the dock in Kodiak. My skipper is required to check in prior to commencing fishing and check out before leaving any management section, along with disclosing all daily catches. We are required to retain all pollock, rockfish and any salmon we might catch and deliver back to town. We do not discard. Additionally we don't drag our nets on the bottom. With what it costs me to buy new trawl nets and make repairs to old ones, dragging my gear on the bottom is completely asinine. I

commend the managers on their attention to detail and keeping all of us accountable, thereby giving us an opportunity to fish.

I completely oppose proposals 14,15,16 and 17 PWS pollock fishery. I thank you sincerely for the opportunity to comment and appreciate all the work you do for all us fishermen and women.

Carmel Carty McCarthy

Proposal #18

I fully support this proposal as it would add 30 additional days to the PWS Sablefish season giving additional opportunity to those who would like to fish into the late summer. I can not think of any negative consequences if this proposal were to be adopted.

Proposal #19

I am strongly opposed to the adoption of this proposal. In it the author states the following: "This change will not take anything away from permit holders". I completely disagree and will explain why in the following paragraphs.

I have held a PWS Sablefish permit going back to the years when the fishery was still being prosecuted as a "derby", hence I have a long history of harvesting Sablefish in PWS. Ever since the fishery was changed to an IFQ managed one there was always a portion of the annual quota that remained unharvested for a variety of reasons, including the original abbreviated harvest seasons, medical issues preventing permit holders from fishing, whale depredation, and times of low abundance. In the most recent years, with the dramatic collapse of ex vessel prices, many permit holders have just simply chosen not to fish, as it was economically unviable to do so and even more fish remained unharvested.

In my opinion, leaving unharvested quota in the water isn't such a horrible thing. There's certainly no obvious downside such as in over escaping a salmon stream. In fact it is a good thing as one would have to assume at least a portion of these fish are of a discrete resident population. Being left in the water would not only add to overall abundance in following years but these fish would gain size and weight and only become more valuable in the future.

The authors of this proposal likely are using slinky pots to harvest their quota which is certainly a good thing, incurring zero loss from whale depredation. The bad thing is they are no doubt "high grading", choosing to release small fish which are worth just pennies per pound back into the water. You can't blame them, perfectly legal, one would be foolish not to.

So therein lies why I oppose the adoption of this proposal, which would surely result in fewer and smaller fish available for harvest in future years for all of the permit holders.

So the quote "This change will not take anything from permit holders" goes entirely out the window".

Finally, the authors of proposal 19 were certainly well aware when they purchased their limited entry permits that they were buying into an IFQ fishery which gave them the privilege to harvest a number of pounds of PWS Sablefish annually based upon TAC for that particular year. No more, no less. It's been working just fine for years. As the saying goes, don't fix it if it ain't broke.

(To be clear there have been no studies ever conducted that I am aware of regarding the interaction and or migration of PWS and GOA Sablefish stocks)

Proposal #26

I am opposed to the adoption of this proposal as written, however I do support the intent of allowing sport fishermen the use of pots to harvest Sablefish. The unlimited catch allowance is unacceptable. I would think the yearly catch should mirror something similar to the PU salmon fishery in the Upper Copper River. 30 per household. Also the year long season proposed is unacceptable as well. Something like April 1 thru September 30 would surely be more appropriate. Considering the weather in PWS, a longer season makes little sense for small sport boats anyway.

Proposal #45

I am strongly opposed to this proposal being adopted as it would have an enormous impact on Chinook escapement to the Upper Copper River. The adoption by the BOF a few cycles ago of the proposal to create Saturday subsistence fishing on the Copper River Flats basically makes

proposal #45 completely unworkable. The original intent of the creation of Saturday subsistence fishing was to give local residents using skiffs a chance to harvest subsistence salmon on their days off, as well while at the same time not having to compete with commercial fishermen. So yes maybe a few more local residents now have better access to subsistence fishing thanks to Saturday fishing. However the overwhelming preponderance of vessels participating in the Saturday subsistence openers are large commercial jet bowpickers worth hundreds of thousands of dollars with multiple subsistence permit holders aboard whom almost entirely hold PWS and Copper River drift gillnet permits. By allowing these boats access to these inside closed waters(created to protect King Salmon) would result in nothing short of an unmitigated disaster. Furthermore this would also, by regulation, open these same waters on Mondays and Thursdays when commercial fishing is closed for conservation concerns.

Finally I feel very strongly that the Native Village of Eyak's subsistence captain SHOULD be allowed access to the inside waters as specified in this proposal while taking tribal members out to the flats to harvest their subsistence salmon.

Proposal #78

I am strongly opposed to the adoption of this proposal for a number of reasons. Obviously if adopted, PWSAC, VFDA, the cities of Cordova and Valdez, processors and last but not least the commercial fishing fleet that hold limited entry permits for PWS, would all suffer enormous financial consequences. There exists no scientific evidence that hatchery raised pink and chum salmon are somehow responsible for diminishing king salmon populations, it is strictly just speculation. Furthermore, there does exist actual real evidence of bottom trawlers taking thousands of king salmon yearly as a bycatch while targeting pollock. Yes, there is in regulation an annual 20,000 king salmon bycatch limit, which is only enforceable by what onboard observers are reporting. And whose to say how accurate those observers' reports really are? An observer sleeps in during a nighttime haul back. An observer becomes "chummy" with the captain and or crew and occasionally "looks the other way" So in reality no one can really say or know precisely just how many king salmon are being tossed back unreported. I suspect there are plenty. Just recently one trawler near Kodiak caught 2,000 kings in a single tow. That reported event indicates just how deadly that fishery can be at times to untargeted species such as king salmon. So in my opinion, the trawl industry, already recognized as a culprit in the diminishing stocks of the king salmon mystery, is having an even greater impact then they are being blamed for.

Needless to say there are also many other factors to be considered when trying to get to the bottom of just why the king salmon population is declining. Obviously warming ocean temperatures, as a result of "climate change" is likely a significant part of the problem. One has to look no further than the extremely warm water "blob" that set up in the gulf of Alaska in 2018 which led to a significant destruction of plankton, resulting in a crash of sockeye salmon returning to the Copper River.

Other factors include over harvesting in some areas of the state, under reporting in some of the PU and subsistence harvests as well very lax enforcement, in particular at fish wheels under federal permits in the Upper Copper River.

And finally, if one really believes that hatchery production of pink and chum salmon in Alaska is somehow responsible for the decline of king salmon, keep in mind Russia releases billions and billions more fry yearly than all of Alaskan hatcheries combined. So reducing the PWSAC and VFDA annual fry release by 25% is a mere "drop in the bucket" to solving this perceived problem while at the same time having a devastating financial effect on communities, fishermen, processors and the hatcheries themselves.

Proposals 51thru 53

I am strongly opposed to these proposals. If any of these 3 were to be adopted it would result in an incredible loss of fishing opportunity for the commercial drift net fleet and consequently a

devastating impact on their yearly income. On many years, daily sonar counts have remained below numbers anticipated, especially so for days early in the season. Historically, this is a notoriously difficult time for area management biologists' decision making. They must consider harvest numbers which may be robust, yet have absolutely no clue as to how many salmon have already entered the river, especially considering the approximate 7 to 10 days travel time to reach the Miles Lake sonar.

I have fished commercially on the Copper River for 36 seasons and can honestly say throughout all of those years area management biologists have always taken a cautious approach and have consistently erred on the side of conservation when managing the Copper River Salmon return. The upriver escapement goal has been met or often exceeded on almost all of those years. The commercial fleet has likely forgone the opportunity to harvest hundreds of thousands of fish over those years under this continuing conservative management.

Given that the peak of the early portion of the run is late May/early June, what the makers of these proposals are asking for would be nothing short of devastating for fleet, as we would likely be leaving tens of thousands of fish to enter into the river daily which would otherwise have been harvested, costing us collectively millions of dollars. Furthermore closing the fishery after just 2 openers leaves the area manager, the upriver biologist as well as the fisherman without having any idea of the strength of the run. In the meantime the sonar counter may not be meeting it's anticipated cumulative expectations for a certain date and yet there could a very substantial amount of salmon that have entered the river. This exact scenario has played out at times over the years after just a couple commercial fishing closures when after a sluggish start the sonar counts begin to skyrocket for several days quickly surpassing anticipated numbers. To have fishing closed for longer durations which would likely happen if any of these proposals were to be adopted, could very likely lead to huge over escapements and a significant amount of lost fishing time and revenue.

I personally have not seen nor heard of data showing early run fish not returning to certain areas up until this BOF cycle. I find it very curious and somewhat suspicious how all of a sudden 3 proposals from 3 different groups just happen to all show up together this year. If in fact however this were the case and early run spawning areas weren't seeing adequate escapement, whose to say early PU and subsistence openings aren't part of the problem? Why haven't the makers of these proposals addressed restricting these groups?

And finally I cannot overstate just how conservatively the Copper River commercial drift fishery has been managed over my 36 years of history and hope BOF members can recognize that and take it into consideration when deliberating these proposals.

Richard Casciano

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

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

I am writing in opposition to proposals 14,15,16 and 17

I am a lifelong Alaskan and Kodiak resident who runs our families trawl vessel in the Gulf of Alaska, we have been fishing here for more than 40 years.

The Alaskan seafood industry is currently in a crisis and closing Prince William Sound to Pollock fishing would be one more hit to already struggling Alaskan businesses. It would also have adverse effects on the salmon populations of PWS, since Pollock are one of the main predators of juvenile salmon. I believe ADF&G also oppose these proposals, and are more than capable of managing this productive fishery.

Thank You
Jason Chandler
F/V Topaz

Submitted by: Stacie Chappell

Community of Residence: Native Village of Eyak (Cordova)

Comment:

oppose #51,52,53 and 78

Dear board of fish! I am expressing my concerns on these proposals. I am a tribal member of the Native Village of Eyak and commercial fisherman! My family as well as about 70% of our tribal member families depend on the Copper River and PWS for our livelihood! And there is a huge percentage of non tribal member Cordova residents that do as well! I live in Cordova Year round with my family and these proposals will have a negative impact on my family and our community.

Thank you for your time.

Submitted by: Roy Chenault

Community of Residence: Houston

Comment:

The guides are bringing more and more people fishing and blowing out the lake louise. Adfg has failed to manage every fishery in alaska so far. If you want to keep the loosing streak keep raising catch limits. When will you learn from your mistakes.

Submitted by: Charles Totemoff , Chenega Corporation

Community of Residence: Anchorage

Comment:

Chenega Corporation opposes 79. Chenega Corporation supports 79, 80 and 81.

Submitted by: Greg Cheremnov

Community of Residence: Cordova

Comment:

I strongly oppose proposals 51,52 and 53. All three proposals have the same premise of closing commercial fishing by regulation after a minimal amount of openers. This is unnecessary regulation because the openers are already determined by escapement and historic run return timing. The ADFG biologist uses these factors in making a determination to open commercial fishing by emergency order. Therefore this regulation would provide no benefit to the management or the copper river salmon stocks. Likely these proposals would have a negative impact. By causing over escapement leading to the decimation of future salmon stocks.

Chickaloon Native Village (CNV) or Nay'dini'aa Na' Kayax is a federally-recognized sovereign Tribal Government in Alaska (Federal Register, Volume 47, Number 227, November 24, 1982, and reaffirmed in Federal Register, Volume 58, Number 202, October 21, 1993), with the full power and authority to consult and enter into agreements with local, state, and federal governments at their discretion. Chickaloon Village Traditional Council (CVTC) is the governing body of CNV as recognized by CNV Tribal citizens with the full power and authority to act for CNV. CVTC has a responsibility to provide a government for the good health and welfare of its Tribal citizens and address any needs in its community.

CNV's ancestral territory and customary area of use encompasses much of Southcentral Alaska and extends from the Wrangell St. Elias Mountains and Copper River Watershed to the Talkeetna and Chugach Mountains and Upper Cook Inlet. This territory includes countless watersheds, rivers, streams, lakes, and wetlands stewarded by CNV Tribal Citizens for thousands of years. CNV's traditional area of influence overlaps neighboring Dena'ina Dene and Ahtna Dene federally recognized Tribes. CNV has a responsibility to steward and protect the environment, cultural resources, and the health of Tribal Citizens and community members in perpetuity. Actions that occur within CNV's traditional ancestral territories and customary area of use, including Copper River Watershed, may impact our environment, the cultural resources including fish and wildlife, and the health, safety, and welfare of our Tribal citizens.

Ahtna Peoples, including CNV Tribal citizens, have long managed salmon using traditional practices deeply rooted in cultural and ecological knowledge, ensuring sustainable salmon runs and protecting this vital resource. As a cultural keystone species, salmon are integral to Ahtna ways of life, and their loss would cause profound and irreparable harm. Principles such as fish allocations and escapement goals are embedded in Ahtna cosmology, reflected in oral traditions and spiritual beliefs. By aligning seasonal harvesting with salmon migration patterns and using selective tools like dip nets, fish wheels, and weirs, Ahtna Peoples ensured adequate spawning and population renewal. Before colonization, we successfully maintained large, sustainable salmon runs through these time-tested methods. Embracing these traditional practices today offers a pathway to restoring balance and securing healthy salmon populations for future generations.

CVTC supports Board of Fish Proposals 51, 52, 53, and 63 to reduce commercial and personal use fishing opportunities in the Copper River District during the early run until a management goal is met. CVTC believes the proposed actions will provide immediate benefit to Copper River sockeye and Chinook salmon populations until a comprehensive genetic-based approach is available for consideration and implementable.

- Proposal 51: Reduce commercial salmon fishing opportunity in the Copper River District.
- Proposal 52: Reduce commercial salmon fishing opportunity in the Copper River District

- 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
- Proposal 63: Amend.the.opening.date.of.the.Chitina.Subdistrict.personal.use.fishery

Further, CVTC supports proposal 17 to increase observation of the Prince William Sound Walleye Pollock Pelagic Trawl Fishery. CVTC is concerned with possible Chinook salmon bycatch in this fishery and believes increased standards for accountability should be applied.

- Proposal 17: Establish.observer.requirements.in.the.Prince.William.Sound.pelagic.trawl.fishery

CVTC also supports proposals 30, 33, and 45 by the Native Village of Eyak to increase subsistence access to traditional foods.

- Proposal 30: Increase.subsistence.Tanner.crab.pot.limit.in.portions.of.Prince.William.Sound
- Proposal 33: Adopt.community_based.subsistence.harvest.permits.and.reporting.requirements.for.shellfish.in.the.Prince.William.Sound.area
- Proposal 45: Allow.subsistence.fishing.for.salmon.in.the.Copper.River.inside.closure.area

Submitted by: Rocky Chirrick

Community of Residence: oregon

Comment:

ive been participating this fishery since early 1990s every year on fishing vessel Pacific Ram its generally the boats first paycheck of the year for me and crew we have never had a bad bycatch issue very little actually you really cant put gear on bottom in there you would destroy your gear its not user friendly for any trawl gear weve had observed trips voluntarily commenting on proposals 14/15/16/17

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

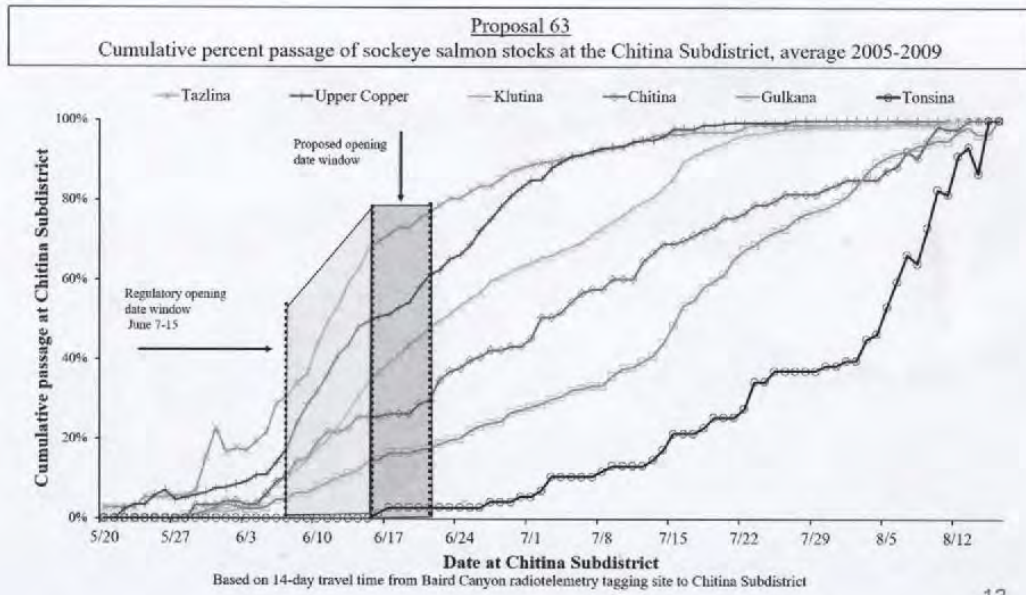
This is a CDA submitted proposal and the proposal language explains our stance. A map showing the existing and new boundary plus the existing short drift area is in **attachment D**.

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

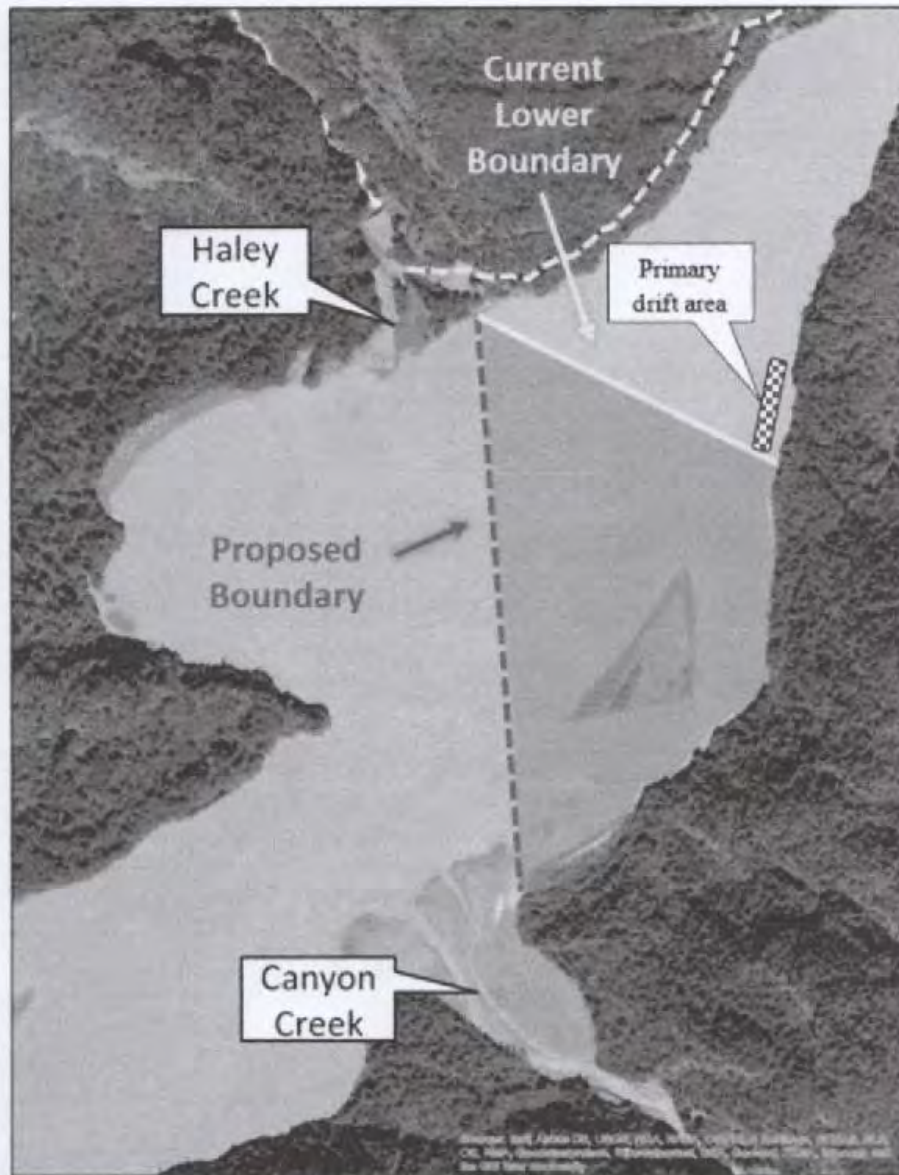
DATA FROM F&G FOR HOUSEHOLDS ACQUIRING BOTH A UCI (SOUTHCENTRAL) AND CHITINA P.U. DIPNET PERMIT

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.



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:

Chugach Alaska Corporation (Chugach) is the Alaska Native Regional Corporation for the Chugach Region established pursuant to the Alaska Native Claims Settlement Act of 1971, as amended, 43 U.S.C 1601 (ANCSA). Chugach owns or has valid selection rights to over 928,000 acres of full fee estate and subsurface estate in the areas around the coastal towns in the Prince William Sound and Chugach Region, including Cordova, Tatitlek, Port Graham, English Bay, Valdez, and Seward. Chugach is currently owned by more than 2,800 shareholders who are primarily of Alutiiq (Sugpiaq), Eyak (Athabascan), and Tlingit descent. Chugach exists to serve the interests of the Alaska Native people of the Chugach Region 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. Chugach 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,

Sheri Buretta
Chairman of the Board



November 20, 2024

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

Re: Proposal 78

Dear Members of the Alaska Board of Fisheries:

Chugach Alaska Corporation (Chugach) is the Alaska Native Regional Corporation for the Chugach Region established pursuant to the Alaska Native Claims Settlement Act of 1971, as amended, 43 U.S.C 1601 (ANCSA). Chugach owns or has valid selection rights to over 928,000 acres of full fee estate and subsurface estate in the areas around the coastal towns in the Prince William Sound and Chugach Region, including Cordova, Tatitlek, Port Graham, English Bay, Valdez, and Seward. Chugach is currently owned by more than 2,800 shareholders who are primarily of Alutiiq (Sugpiaq), Eyak (Athabascan), and Tlingit descent. Chugach exists to serve the interests of the Alaska Native people of the Chugach Region and to preserve the rich culture heritage of its lands.

Chugach opposes Proposal 78 which would reduce hatchery production of pink and chum salmon by 25%. Healthy, vibrant, sustainably managed fisheries help support the economy in the Chugach Region. In PWS hatcheries contribute significantly to the fishing industry with over 2,200 jobs and \$315 million in total economic output from pink and chum salmon production. Proposal 78 significantly threatens coastal communities dependent on both pink and chum salmon fisheries in the Chugach Region. Chugach shareholders and descendants depend on vibrant pink and chum salmon fisheries and Proposal 78 poses a significant threat to these commercial fisheries.

Fish hatcheries in PWS ensure that sustainable harvest of both pink and chum salmon are accessible to all user groups including commercial, sport, personal use, and subsistence fishermen. In addition, the pink and chum salmon help fund production of coho and sockeye salmon which enhance sport, subsistence, and personal use fisheries.

Please oppose Proposal 78. Thank you for considering this request.

Sincerely,

A handwritten signature in black ink that reads "Sheri Buretta".

Sheri Buretta
Chairman

Submitted by: Andrzej Ciostek

Community of Residence: 13651E.Norman Av. Palmer ,AK

Comment:

I support The Alaska Outdoor Council Proposal 14 5 AAC 28.263. to help the conservation of salmon in (PWS) Prince William Sound in its entirety. Preservation and conservation of ecosystems for marine life it's the best way to protect our salmon for now and next generations.

**CITY OF CORDOVA, ALASKA
RESOLUTION 11-24-34**

**A RESOLUTION OF THE COUNCIL OF THE CITY OF CORDOVA, ALASKA, IN
SUPPORT OF ALASKA'S SALMON HATCHERY PROGRAM AND IN OPPOSITION
TO PROPOSAL 78 WHICH WILL BE BEFORE THE ALASKA BOARD OF FISHERIES
AT THE DECEMBER 10-16, 2024, MEETING**

WHEREAS, the City of Cordova benefits greatly from Alaska's Private Nonprofit Salmon Hatchery Program; and

WHEREAS, Alaska's salmon hatchery program has successfully operated for 50 years, supplementing wild salmon harvests, and supporting fisheries throughout the state, especially in salmon-dependent communities like Cordova; and

WHEREAS, Proposal 78 would reduce hatchery production by 25%, impacting hatcheries in the Prince William Sound region at a time when coastal communities like Cordova need salmon production stability and support for wild stocks most; and

WHEREAS, reducing pink and chum salmon production by 25% would cause significant harm to Cordova's economy, diminishing fisheries tax revenues and disrupting the economic flow that hatchery salmon provides to Cordova's local businesses and families; and

WHEREAS, hatchery programs play a well-documented role in supplementing wild salmon returns, stabilizing coastal economies, and reducing harvest pressure on wild stocks, particularly during years of lower abundance; and

WHEREAS, Proposal 78 would introduce uncertainty into the production of Alaska hatchery salmon, complicating planning and loan obligations for hatchery associations and ultimately risking the sustainability of Alaska's hatchery program, which has long been a partnership model between private nonprofits and the State; and

WHEREAS, Alaska's salmon hatchery program supports an estimated 4,200 jobs, \$219 million in labor income, and \$576 million in total economic output annually, with over 14,000 Alaskans earning a portion of their income from hatchery salmon; and

WHEREAS, the Prince William Sound Aquaculture Corporation (PWSAC) headquartered in Cordova and the Valdez Fisheries Development Association (VFDA) contribute significantly to the economies of Prince William Sound communities by providing jobs and generating an estimated \$200 million in combined economic output annually; and

WHEREAS, Cordova, as a rural, off-road community, relies on economic stability to sustain its families, support local businesses, and create a place where young families, lifelong residents, and local enterprises can thrive; and

WHEREAS, the processing of pink and chum salmon in Cordova has been a critical factor in stabilizing electric rates over the past 20 years, as revenue from the growing salmon industry has allowed Cordova's local electric cooperative to spread operating costs and fund innovative grid advancements, increasing resilience and affordability year-round for the community; and

WHEREAS, the data surrounding hatchery impact on wild salmon populations is inconclusive and does not justify the drastic production reductions proposed by Proposal 78; and

WHEREAS, Alaska's salmon hatchery program operates as a nonprofit model, is self-funded through cost recovery and enhancement taxes, and follows a rigorous public permitting process employing sound scientific methods to sustainably protect wild salmon populations while benefiting all user groups, including subsistence, personal use, sport, and commercial fisheries; and

WHEREAS, Proposal 78 threatens to disrupt the sustainability of Alaska's hatchery programs by imposing a new oversight process that conflicts with existing regulatory structures, which have successfully overseen the balance between hatchery and wild stocks.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF CORDOVA, ALASKA, that:

Section 1. The City of Cordova firmly opposes Proposal 78, which will be considered at the December 10-16, 2024, Alaska Board of Fisheries meeting in Cordova, and urges the Board to reject this proposal to prevent economic harm and unnecessary disruption to Alaska's hatchery programs.

Section 2. The City of Cordova reaffirms its support for Alaska's Salmon Hatchery Programs, including PWSAC and VFDA, recognizing their role in supporting Cordova's community, economy, and sustainable fisheries practices.

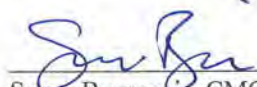
Section 3. The City of Cordova calls on the Alaska Board of Fisheries to support science-based, unbiased, assessment methods for hatchery management in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to better understand the benefits Alaska's salmon hatcheries provide to all Alaskans.

PASSED AND APPROVED THIS 6th DAY OF NOVEMBER 2024.



ATTEST:


David Allison, Mayor


Susan Bourgeois, CMC, City Clerk

CITY OF VALDEZ, ALASKA

RESOLUTION #24-45

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA,
SUPPORTING THE ALASKA SALMON HATCHERY PROGRAM

WHEREAS, the City of Valdez benefits greatly from the Alaska Private Non Profit Salmon Hatchery Program; and

WHEREAS, Alaska's salmon hatchery program has operated for 50 years and supplements wild salmon harvests throughout the state; and

WHEREAS, Alaska's salmon hatchery program is a model of sustainable economic development that directly benefits subsistence fishermen, personal use fishermen, sport fishermen, charter fishermen, commercial fishermen, seafood processors, as well as state and local governments such as Valdez; and

WHEREAS, Alaska hatcheries accounted for 76% of the total common property commercial catch and 64% of the total ex-vessel value totaling \$46 million in the Prince William Sound region in 2023; and

WHEREAS, the Prince William Sound Aquaculture Corporation (PWSAC) headquartered in Cordova and the Valdez Fisheries Development Association, Inc. (VFDA) headquartered in Valdez contribute significantly to the economies of Prince William Sound communities by providing jobs and an estimated \$200 million in combined economic output annually; and

WHEREAS, reducing hatchery produced Pink and Chum Salmon by 25% will significantly impact fisheries tax revenues Valdez receives and greatly reduce wharfage and dockage fees generated due to the loss of an estimated 4 million pounds of salmon products crossing the Port of Valdez shipping terminals annually; and

WHEREAS, cost recovery revenues from the sale of hatchery produced Pink salmon significantly fund VFDA's Coho salmon sport fish enhancement program, which is the cornerstone of the Valdez summer economy, providing salmon for many sport fish related businesses and the Valdez Fish Derbies; and

WHEREAS, Alaska's salmon hatchery program has proven to be significant and vital to Alaska's seafood and sportfish industries and the State of Alaska by creating employment and economic opportunities throughout the state and in particular coastal communities such as Valdez; and

WHEREAS, Alaska's salmon hatchery program is non-profit and self-funded through cost recovery and enhancement taxes on the resource and is a model partnership between private and public entities; and

WHEREAS, the State of Alaska has significantly invested in Alaska's salmon hatchery programs and associated research to provide for stable salmon harvests and to bolster the economies of coastal communities like Valdez, while maintaining a wild stock escapement priority; an

City of Valdez, Alaska
Resolution #24-45
Page 1

WHEREAS, Alaska's salmon fisheries continue to be certified as sustainable by two separate programs, Responsible Fisheries Management (RFM) and Marine Stewardship Council (MSC); and

WHEREAS, salmon hatchery programs are permitted and overseen using a transparent public process, employ strong scientific methodology, and are built upon sound and sustainable fisheries policies intended to protect wild salmon populations.

NOW, THEREFORE, BE IT RESOLVED, BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, that

Section 1. The City of Valdez affirms its support for Alaska's Salmon Hatchery Programs, including PWSAC and VFDA.

Section 2. The City of Valdez supports unbiased and scientific methods to assess the interaction of Alaska's salmon hatchery programs with natural stocks, such as the Alaska Hatchery/Wild Salmon Interaction Study which began in 2011 and the Salmon Ocean Ecology Program.


Section 3 The City of Valdez calls on the Alaska Board of Fisheries to reject proposals to reduce hatchery production, including Proposal 78, and work with the hatchery community, the Alaska Dept. of Fish and Game and industry leaders to further its understanding of the importance of the Alaska salmon hatchery program to all Alaskans and the scientific study surrounding hatchery wild salmon interactions.

PASSED AND APPROVED BY THE CITY COUNCIL OF THE CITY OF VALDEZ, ALASKA, this 6th day of November 2024.

CITY OF VALDEZ, ALASKA


Dennis Fleming, Mayor

ATTEST:


Sheri L. Pierce, MMC, City Clerk



Submitted by: Jennifer Clark

Community of Residence: Wasilla

Comment:

I support proposal 14. This fishery is ruining our salmon, halibut, and crab fishery

Submitted by: John Clark

Community of Residence: Wasilla

Comment:

I support proposal 14. We need to protect the ecosystem!

Submitted by: Rebecca Clark

Community of Residence: Anchorage

Comment:

Please adopt #51. I lived in Glennallen and worked for Copper Valley Air for years. The economic impact on companies like Copper Valley Air when the river system is shut down is substantial.

Many in the community depend on the Salmon for their livelihood.

Submitted by: Katherine Clawson

Community of Residence: Fairbanks

Comment:

Personal use dipnetting in chitna is a family tradition and how my family gets most of its fish for the year. It is one of the unique things about being Alaskan that we do. I'm all for protecting the fish runs, but taking away this personal use permit to allow commercial permits goes against not only what 99% of Alaskans want, but violates the very spirit of living up here.

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. I am from the Kenai Peninsula, Alaska, and my family currently participates in the sport and subsistence fisheries. Hatcheries have been my livelihood for 22 years. Proposal 78 would impact the amount of fish available to all user groups by reducing the number of fish to catch. Competition for available fish has greatly increased, with more and more visitors and residents wanting to catch salmon each season. Pink salmon fulfill a visitor's dream of catching a salmon, as the other salmon species become less numerous to catch. Therefore, pink salmon can reduce the pressure on other salmon species.

In addition, I have personally observed other salmon species, during the smolt stage, eating young pink salmon as they migrate out. This observation could benefit the survival of these other salmon as they make the difficult transition to saltwater. Pink salmon are an asset to food security for Alaskans and for an increasing world population. Proposal 78 would have a severe impact on the hatcheries themselves, as the expenses alone to keep a hatchery viable are very costly.

For the statements listed above, reducing the amount of pink salmon production from the hatcheries by one-quarter could have a significant impact. It is shortsighted and a bad idea.

Sincerely,
Cathy Cline

A black rectangular redaction box covering the signature area.

Kenai Peninsula, Alaska

November 24, 2024

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

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

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

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,
Cathy Cline



Kenai Peninsula, 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 and a third generation fisherman. Hatcheries have supported me and my family for generations. Proposal 78 would result in a loss of income, not only for my business, but my crew and the community.

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,

Dustin Cline

[REDACTED]

Prince William Sound

Submitted by: Clemens Clooten

Community of Residence: Fairbanks

Comment:

BOF,

My family and myself oppose the following proposals (44-47, 49, 50, 54-57, 60-69, 70) that are in any way against dipnetting on the Copper River, and reducing the amount of fish taken and reducing the days that fishing is allowed. Our family uses the Copper River red and king salmon through out the year.

We are supporting the following proposals (48, 51, 52, 53, 58, 59, 70).

Our family supports the proposals the Chitina Dipnetters Association approve.

Thank you,

The Clooten Family



From: Kurt Cochran marathon@peak.org
Subject: Chairwoman Carlson-Van Dort and Board Members
Date: November 26, 2024 at 7:45 AM
To: Kurt Cochran marathon@peak.org

Chairwoman Carlson-Van Dort and Board Members

PWS Pollock

The pollock fishery is very important to our family and families that work on our boats. We have three boats Son-in-law Axel-Marathon, Son Keith -Bay Islander and myself - New Life the boats support over 18 family's.

They are 80 to 90 feet.

The sound is a safe place to fish out of the weather this time of year. I have been fishing there probably 30 years when there were plants and tenders there buying pollock and boats were smaller.

We start our year off in the sound it is the first pollock to come into Kodiak. For this reason it is important no one has had a pay check since November and it is the place we can fish clean. We don't take chances with our nets. Seattle is where my nets have to go to be fixed and we would lose our season. The bottom is unknown and deep we don't put our nets on the bottom and take that risk to catch pollock.

The sound is a clean fishery the data shows that.

I have taken state observers out over the years but not recently. A lot of the time we have federal observers on the boat doing nothing and now we have EM cameras that the state could access.

The state keeps it a slow pace fishery only allowing a few boats 6 to 8 at a time to fish so things don't go side ways with bycatch. All of our boats use a salmon excluder and one boat has live camera to see what we are catching.

In short the PWS pollock fishery has more benefits to the state than not.

The pollock love to eat pink salmon smolts so removals of pollock is good for the salmon. We should probably be catching more.

PWS generates Revenue for ADFG,
Revenue for boats,family's and the plant work force.

So I ask the board to leave the PWS pollock fishery open.

Don't support proposals 14, 15, 16 and 17

Thank You

Kurt Cochran

Submitted by: Kirk Coen

Community of Residence: Delta Junction

Comment:

63,64,65

Submitted by: George Cole

Community of Residence: Willow

Comment:

Regarding proposal 16, I whole heartedly agree that trawling doesn't have a place in Alaska fisheries. While some populations are healthy others are on the brink of disaster. We need to eliminate non selective fisheries, trawling is the worst of these.

With regards to copper river, it's my understanding that subsistence and personal use fisheries, under Alaska law, are placed ahead of commercial interests. On the copper river the personal use and subsistence fishers shouldn't have their number reduced as they catch 100-150K fish per year while commercial is catching over 3 million.

Specifically I don't support proposal 49. The transporter services allow people of lesser means to participate in the fishery. Yes its costs 200 with Hem and Copper but that is far less than buying a 4 wheeler, a truck and trailer to pull it.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. ADF&G already monitors fish counts and their escapement goals with the use of fish counters. This additional information doesn't seem helpful. I don't understand how ADF&G would use these numbers in conjunction with their current number gathering methods. I see a risk in potentially double counting fish or a scenario where data is not meshed effectively and leads to poor management of the fishery.

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.

James Colles Position: Oppose. Inseason reporting would be an additional burden on users and department, and compliance with the 5-day reporting requirement may be challenging to enforce. The department already has the authority under 5 AAC 01.015 and 5 AAC 77.015 to require more frequent reporting but has not because it is not needed for effective and sustainable inseason management. Additionally, similar data issues as mentioned in proposal 46 opposition.

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.

James Colles Position: Support. This would provide greater access to the fishery for those who do not have access to a nonguided boat that can operate on the Copper River, or do, but do not have the skills to operate it on the Copper River. This will allow access for those with physical limitations.

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.

James Colles Position: Oppose. Due to the lack of public lands, most permit holders would be limited to dipnetting within the 1-mile section of shore immediately above the Chitina-McCarthy Bridge. Keeping access to state resources for Alaskan residents is important, and creating a small open area wouldn't be beneficial for maintaining this access.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings. Additionally, there are no regulations linking restrictions in the Copper River District commercial gill net fishery to sport fish guiding in the Upper Copper River drainage. There are also no regulations that define guided fishing in a personal use fishery.

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.

James Colles Position: Support. Concur with ADF&G staff findings.

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.

James Colles Position: Support. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Sockeye salmon counts are not a concern currently. I would prefer to see the protection of the King Salmon in this area.

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.

James Colles Position: Oppose. I see no benefit in reducing the fishing limit and expanding slowly. The fishery is already controlled by escapement goals the ADF&G monitors.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. This would be administratively burdensome and challenging for enforcement.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Support. Having more space to stretch out the boats can result in lower congestion due to the longer drift time and the ability to space out further from other boats.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

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.

James Colles Position: Oppose. Concur with ADF&G staff findings.

Submitted by: Bill Comer

Community of Residence: Valdez

Comment:

I am opposed to proposal #78.

As the owner operator of a sport fishing charter business and a short term rental operation in Valdez, Alaska, I am opposed to Reducing pink salmon egg take for VFDA. The Pink chum and silver salmon VFDA raise are a Major economic Engine for the city of Valdez and Prince William sound every summer. I have dozens of clients and customers who come to Valdez to Fish, salmon as well as sightsee and observe the commercial Salmon industry in operation.

VFDA has a very Unique situation being located along the Trans Alaska oil pipeline, it uses water from a hydroelectric dam, has an oil refinery on one side and Marine Terminal on the other side. VFDA fosters a cooperative relationship between all these competing industries. All the while providing pink salmon for a commercial fleet and Silver Salmon for the sport fishing and tourism . Much of the funding for the silver salmon comes from funds generated from the pink salmon harvest.

Please do not support # 78



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Commercial Fisheries Entry Commission

Mailing Address: PO Box 110302
Juneau, Alaska 99811-0302
Main: 907.789.6160
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Physical Address: 8800 Glacier Highway, Suite 109
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To: Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries

Date: November 26, 2024

Thru: Glenn Haight, Chair
Rick Green, Commissioner
Commercial Fisheries Entry Commission

Subject: CFEC Comments on
Proposals 56, 57, 73, and 74:
Dual and stacked permit
proposals for PWS seine and
drift gillnet operations

From: Reid Johnson, Research Section Lead
Commercial Fisheries Entry Commission

Proposals 56 and 57 request that the Board of Fisheries consider allowing dual permit operations in the Prince William Sound (PWS) drift gillnet salmon fishery. Dual permit operations involve two permit holders collaborating on a single vessel to harvest fisheries resources. This arrangement allows permit holders to share vessel-related costs, such as insurance and maintenance, reduce crew expenses, and potentially benefit from additional gear allowances granted at the Board's discretion.

In addition to dual permit operations for drift gillnet vessels, these proposals further ask that the Board to consider stacked permit operations for the drift gillnet fishery, where one individual owns and operates two permits. Unlike dual permit operations, stacked permits do not involve cost-sharing with another individual, and the permit holder remains responsible for vessel expenses and paying crew shares.

Proposal 73 and 74 both request the board consider allowing permit stacking for the PWS seine salmon fishery. The Board allowed dual permit operations for seine gear in PWS during the last board cycle.

The Commercial Fisheries Entry Commission (CFEC) monitors permit prices across Alaska's limited entry fisheries. In response to public inquiries about the potential impacts of dual and stacked permit operations on permit prices, we offer the following for consideration:

1. **Permit Market Dynamics**

The PWS drift gillnet and seine fisheries operate under a limited entry system, with a finite number of permits available. There are 535 gillnet permits, and 267 seine permits. Under basic supply and demand economics, when supply is fixed, changes in demand directly influence price. Currently, demand for permits is constrained by regulations that generally allow individuals to fish only one permit at a time. There is little incentive to own multiple permits under these rules since a second permit cannot be actively fished.

2. **Impact of Stacked Permit Operations**

If stacked permit operations are permitted, allowing an individual to fish with additional gear upon purchasing a second permit, demand for permits would increase. As the supply of permits cannot expand, this increased demand would lead to higher permit prices if all other factors that influence permit prices remain constant.

3. **Impact of Dual Permit Operations**

Dual permit operations could lower barriers to entry for commercial fishing. By enabling individuals to fish under a dual permit arrangement, prospective entrants could avoid the significant upfront costs of purchasing both a permit and a vessel, which often cost hundreds of thousands of dollars each. Instead, an individual could purchase only a permit and then negotiate cost-sharing agreements with an existing vessel who also owns a permit. While increased participation would raise demand and permit prices, dual permit operations could still reduce the total cost of entry.

4. **Latent Permits and Price Buffering**

The PWS drift gillnet fishery has a substantial number of latent permits—permits held by individuals who choose not to fish. When dual or stacked permit regulations are enacted, latent permit holders often sell their permits to active participants, increasing the number of permits being fished. This latent supply serves as a buffer, mitigating the potential price spikes caused by heightened demand. In 2023, a total of 91 PWS drift gillnet permits were latent, or 17 percent of the 535 permits available. Permit latency has been increasing in the PWS drift gillnet fishery since 2013. In the PWS salmon seine fishery, there were 33 latent permits in 2023 (12 percent).

In summary, the adoption of dual or stacked permit operations would likely lead to increased demand for permits, driving higher permit prices. Allowing dual permit operations will also lower entry barriers to fisheries by reducing initial investment requirements for prospective participants. The presence of latent permits in the PWS drift gillnet fishery will temper the extent of these price increases, providing an additional layer of market stability.

Finally, we are obligated to point out that the financial performance of the fishery will continue to be the primary driver of permit prices. Allowing dual or stacked permit operations will impact permit prices, but the primary driver of permit prices will continue to be the perceived value of future income generated from fishing efforts.

CFEC report number 24-08N provides more detailed information on permit prices, latency, and average gross earnings per individual or permit.

If you have any questions or for further clarification, please contact us at your convenience:

[REDACTED]

Submitted by: Clinton Connelley

Community of Residence: Fairbanks

Comment:

I OPPOSE Proposals 44,45,46,47,49,50,54,55,56,57, 60,61,62,63,64,65,66, 67,68,69,71
and I SUPPORT Proposals 48,51,52,53,58,59,70.

I believe the salmon of Alaska belong to the local Alaskan residents. If there is a need to reduce the catch and increase the escapement numbers my belief it has to come from the for profit operators using the Alaskan owned fish. Commercial fishing is only an option when there are enough fish for all personal use and escapement combined.

Thank you,

Clint Connelley

Submitted by: William Conner

Community of Residence: Petersburg

Comment:

I am opposing proposal 14 and 15 and 16 and 17.

I have been fishing since 1975. I seine in PWS for salmon and I-- my vessel participates in the trawling in WG and CG and someday PWS.

I am a one boat owner and employ up to 8 separate individuals and family's throughout the year.

Pollack trawling in PWS had helped the salmon survival; when the quota was not caught or was not taking place the pollack target the hatcheries pink smolt in a much larger number and we have seen at times the run failures at the hatcheries in a big part because of the pollack predation. I would in fact propose a larger quota in PWS so as not to experience a salmon failure like we have had in 2024.

I strongly oppose any closure or limitation of the pollack trawl fishery in PWS.

Bill Connor

November 24, 2024

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

Dear Board of Fisheries,

I am from Petersburg, Alaska, and I'm involved in commercial fishing, specifically salmon seining in Prince William Sound. The hatcheries have allowed for a more even income over the past decades by providing more harvest opportunities, which in turn has created a stable income for my business, my family, and the incomes of four other families. Proposal 78 would, at a minimum, decrease my annual income by 25% and reduce the potential to find crew members willing to fish for 25% less. If those supporting Proposal 78 were to consider reallocating 25% of their own income to support the fishing families who rely on hatcheries, it could sway my opinion.

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,
William Connor

Petersburg, Alaska

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

November 26, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

My family owns and operates the F/V Leslie Lee. The Leslie Lee is a 97-foot catcher vessel that has fished out of Kodiak since the early 1990s for both Pollock and Cod. The vessel has participated in the PWS Fishery during this time. My Family bought the Leslie Lee in 2018 and since then we have participated in the PWS fishery for several years. Right now, trawl fishing families like ours are struggling with poor markets and low prices, just like nearly every other commercial fishery. We need all opportunities now more than ever to provide for our families and coastal communities, so I would hate to lose the ability to fish in the PWS Pollock fishery.

As a trawl family, we are used to monitoring and closely managed fisheries. When fishing in the federal pollock fishery, our vessel has their EM system on for 100% of all fishing trips and we keep everything we catch as we are required to do. The State has the ability to put observers on our boat in PWS, and I trust that they would if they thought we had an issue. My captains and crew have nothing to hide and the reality is PWS pollock is a very clean fishery that operates in daily communication with the State manager. There is not a valid reason to close or alter this fishery, and the fact that the Department opposes all four proposals communicates that.

Making significant changes to Gulf of Alaska fisheries like PWS pollock, and even contemplating a closure, during this extremely dire economic climate is a significant risk to all of us as harvesters, the processing plants we rely on, and our coastal communities.

Thank you for the opportunity to comment. I urge you to oppose Proposals 14, 15, 16, and 17.

Sincerely,



Mark Cooper

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

November 26, 2024

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Making significant changes to Gulf of Alaska fisheries like PWS pollock, and even contemplating a closure, during this extremely dire economic climate is a significant risk to all of us as harvesters, the processing plants we rely on, and our coastal communities.

Thank you for the opportunity to comment. I urge you to oppose Proposals 14, 15, 16, and 17.

Sincerely,



Mark Cooper

COPPER RIVER SEAFOODS

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PC148

November 26, 2024

Scott Blake, CEO & Co-Founder
Copper River Seafoods
1400 East 1st Avenue
Anchorage, Alaska 99501

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

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

Meeting Proposals

Dear Members of the Alaska Board of Fish,

Please consider the following comments from Copper River Seafoods in advance of the Alaska Board of Fisheries Prince William Sound and Upper Copper/Upper Susitna Rivers Finfish and Shellfish (Except Shrimp) Meeting in Cordova, Alaska December 10-16, 2024.

We are writing to express our perspective regarding four proposals within the Commercial Groundfish proposal section including 14, 15, 16, 17 which address the impact of trawling on the ecosystem of Prince William Sound (PWS). I do not believe the issues expressed within these proposals is solved by an absolute shutdown of the pollock fishery in PWS, particularly with respect to the growing pollock biomass and its far-reaching consequences on other marine species.

In PWS, pollock are preying on euphausiids, fish, herring, copepod nauplii, eggs, and adult copepods. They represent a massive biomass and current pollock populations are not well understood. This lack of science-based knowledge about the size of the pollock population as well as their impact on other PWS fish stocks, has profound implications for the broader ecosystem. If left unchecked, the expanding pollock biomass has the potential to destabilize populations of other species critical to PWS fisheries and marine biodiversity.

Pollock consume key species across the food web, in Prince William Sound this likely means hatchery salmon fry, wild salmon fry, herring, juvenile crab, and more. Allowing this biomass to grow unchecked may ultimately lead to ecosystem collapse, threatening the livelihoods of all user groups dependent on these resources. It is worth noting that we are starting to observe interactions with the pollock biomass in the newly opened PWS herring fishery and have questions about the relationship between pollock predation on herring.

To address this challenge, we propose:

1. More Deeply Study Pollock in PWS: Better understand the impact of increasing pollock biomass in PWS so that we know the impact on salmon – including hatchery returns - and amongst the many other species harvested in PWS, notably the recently re-opened PWS herring fishery.
2. Create Local Stewardship: Engage local PWS companies and local harvesters to harvest the pollock fishery responsibly, fostering a vested interest in maintaining ecological balance.

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3. Expand Fishing Opportunities: Introduce longer and more extended harvest periods with small-boat fisheries to efficiently control biomass while minimizing bycatch.
4. Mandatory Observer Coverage: Require 100% observer coverage on all ADFG PWS pollock test fisheries to ensure accountability and adherence to bycatch regulations.
5. Sustainable Biomass Management: Focus on harvesting pollock to prevent overpopulation while protecting critical species like crab, halibut, herring, and salmon from predation and competition.

We **support Proposal 15** which modifies bycatch limits in PWS and mandates that bycatch is brought to port and surrendered to ADFG potentially to support local food aid programs or SeaShare.

We **support Proposal 17** with modifications. Remove request for electronic monitoring as this is not a request the BOF can address. Revise request for 50% physical onboard observer coverage to require 100% observer coverage on all ADFG PWS pollock test fisheries to ensure accountability and adherence to bycatch regulations.

We **oppose Proposals 14 and 16** —shutting down trawling and allowing the pollock biomass to expand unchecked would create havoc across all user groups, culminating in ecological and economic damage that would be difficult to reverse. If the biomass grows too large, it risks collapsing entire fisheries and reducing opportunities for future generations. Shutting down the fishery altogether would hurt stakeholders across the board.

We urge the Board of Fisheries (BOF) to consider an alternative approach to pollock fishery management in PWS to ensure a balanced, science-based approach to managing the pollock biomass while heeding the concerns of PWS stakeholders. A deeper understanding of the impacts of increased pollock populations in PWS, coupled with more robust oversight and community-based stakeholders, would allow us to navigate the challenges of trawl damage and bycatch while protecting the long-term sustainability of our marine resources and economic opportunity for PWS stakeholders.

Sincerely,

Scott Blake, CEO & Co-Founder
Copper River Seafoods

###

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PC148

November 26, 2024

Scott Blake, CEO & Co-Founder
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Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526 Juneau, AK 99811
marit.carlson-vandort@alaska.gov

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

Dear Members of the Alaska Board of Fish,

Please consider the following comments from Copper River Seafoods in advance of the Alaska Board of Fisheries Prince William Sound and Upper Copper/Upper Susitna Rivers Finfish and Shellfish (Except Shrimp) Meeting in Cordova, Alaska December 10-16, 2024.

Who We Are: Copper River Seafoods Impact in Alaska

At Copper River Seafoods, we are dedicated to Alaska's economy, communities, and natural resources. At peak, we directly employ nearly 700 people and provide critical support to commercial fishermen throughout Southcentral, Southwest, and Far North Alaska. With primary processing facilities in Cordova and Naknek and buying stations in Homer, Kotzebue, Seward, and Whittier, we sustain a network that drives Alaska's seafood industry and supports communities statewide. We operate an added-value manufacturing facility and one of the largest cold storages in Anchorage, which are instrumental to food security in Alaska by enabling us to feed Alaskans through supplies to local grocery stores, restaurants, food banks, and other food distribution hubs year-round. In 2024, we entered a 3-year USDA supported grant partnership with the Anchorage School District to bring nutritious Alaska seafood to 40,000 students through local school meals. In collaboration with the non-profit SeaShare, in the months of October and November 2024 alone, we provided 50,000 pounds of ready-to-cook seafood—equating to 200,000 meals—distributed to food banks statewide including Port Graham, Matsu, Homer, Hooper Bay, Bethel, and Fairbanks. For nearly 30 years, we have been a cornerstone of Alaska's seafood industry, supplying fresh, frozen, and value-added products to local, national, and international markets. As we expand our reach, our commitment to Alaska remains unwavering. We are committed to supporting our fishermen as new fisheries open, demonstrated most recently by our commitment to support the newly opened Prince William Sound Herring Fishery.

Salmon Management Plan Comments

We **strongly oppose**:

- Proposal 51
- Proposal 52
- Proposal 53

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CRS Comments on Proposals 51, 52, 53

The Critical Importance of Early-Season Copper River Salmon

The salmon supply from Copper River is vital to our operations and to the communities that depend on it. Restricting early-season commercial fishing opportunities, as outlined in Proposals 51, 52, and 53, undermine the flexibility required for adaptive, in-season management.

Climate variability already presents challenges, and rigid mandates risk over-escapement and lost commercial harvest opportunities. 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 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 decade 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.

The objectives of these proposals will have severe economic impacts to the fleet and the region. We’d be remiss to not mention the market perspective, which is these restrictions would inflate early-season pricing, shorten promotional windows, and discourage buyers—ultimately harming fishermen and the entire supply chain.

Allocation Plan and Hatchery Operation Comments

We **strongly oppose**:

- Proposal 78

We **support**:

- Proposal 79
- Proposal 80
- Proposal 81

CRS Comments on Proposal 78

The Harmful Impacts of Prince William Sound Hatchery Production Cuts

Prince William Sound has faced significant setbacks in recent years. Now, Proposal 78 threatens to further damage Alaska’s \$600 million hatchery-driven economy by arbitrarily cutting hatchery production by 25%. Alaska’s hatchery programs not only ensure food security and stability for coastal communities but also produce nearly one billion meals globally every year. Proposal 78 serves another major blow to an industry that is on the brink and can’t handle much more.

NAKNEK
.5 Mile AK Peninsula Hwy

KOTZEBUE
843A Old Nana Fish Plant

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CORDOVA
300 Cannery Row

HOMER
795 Fish Dock Road

ANCHORAGE WEST
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COPPER RIVER SEAFOODS

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PC148

This proposal would have devastating consequences for businesses like ours, which rely on Prince William Sound chum and pink salmon for summer operations. Reduced access to the pink and chum resource increases our operational costs by limiting throughput in our Cordova, Whittier, and Anchorage facilities. Cuts to production limit opportunities for our fishing fleet. For the processors and sellers of PWS salmon, further cuts disrupt relationships with important customers who depend on these products. Reducing the resource by 25% makes the fishery less relevant and key buyers will look elsewhere to other markets. Once lost, markets will take time to rebuild and many more Alaska Seafood customers will lose faith in Alaska.

In summary, cutting production by one quarter devastate businesses like ours by reducing access to Prince William Sound chum and pink salmon, increasing operational costs, and eroding market competitiveness. Communities like Cordova and Valdez, already grappling with economic instability, would bear the brunt of Proposal 78, but Prince William Sound processors like Copper River Seafoods will suffer devastating impacts too.

CRS Comments on Proposals 79, 80, 81

The Importance of Reducing Hatchery Operation Interference

Hatcheries are the backbone of sustainable fisheries in Prince William Sound (PWS), ensuring that fish populations remain robust for all user groups—subsistence, sport, and commercial. Without the ability to complete critical operations like broodstock collection and cost recovery, hatcheries cannot fulfill their purpose. This failure threatens the very existence of fish stocks, leaving all user groups with nothing. The Board of Fisheries (BOF) must take decisive action to protect hatchery operations from interference to preserve the delicate balance that benefits everyone. Allowing disruptions to continue will compromise the sustainability of the fishery and jeopardize the livelihoods, traditions, and opportunities of countless Alaskans.

Proposal 79

Hatcheries exist to serve all user groups, but only if they can complete their primary tasks of broodstock collection and cost recovery without interference. We share concerns about the disruption of hatchery operations due to increasing interference and concur with the recommended adjusted language within this proposal to allow hatcheries to function efficiently. It is crucial that all user groups stay out of the way during critical hatchery operations, ensuring sustainable fish stocks for everyone once cost recovery is complete. We request that the State make the necessary corresponding subsistence, personal use, and sport fishery regulatory changes to be consistent with the requested change to commercial fishery regulations.

Proposal 80

This proposal is closely aligned with Proposal 81.

Proposal 81

We strongly support the recommendations of Proposal 81 which implement restrictions, such as prohibiting hook use and preventing access during cost recovery operations. Without these measures, the problem will worsen, potentially leading to catastrophic impacts on hatchery operations. The use of snagging hooks in Main Bay is causing significant harm to hatchery operations, leading to injuries that increase the risk of infectious hematopoietic necrosis (IHN) transmission—a disease that has recently impacted up to 50% of broodstock in the area in recent years. While the exact source of IHN is unclear, the evidence strongly suggests that current fishing practices are contributing to the problem. To protect hatchery operations and ensure sustainability for all user groups, snagging hooks should be prohibited, and Main Bay should be designated as a non-sport fish area during hatchery operations. Access can be allowed after hatchery needs are met, but it is vital to resolve this issue now to prevent further harm to the fishery.

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PC148

Regards,
Scott Blake, CEO & Co-Founder
Copper River Seafoods

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

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fishermen. I am a lifelong commercial purse seiner in PWS. I have owned and operated my boat for 25 years. My parents had their own seine operation in the sound in which they raised me. I was born and raised in Homer, Alaska.

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,

Megan Corazza

A solid black rectangular box used to redact the signature of Megan Corazza.

Homer

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.

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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.

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 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 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 writing to strongly oppose Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. I'm from Valdez, Alaska, where I hold PWS permits and work as a boat owner and captain. Growing up in Alaska's salmon hatchery industry, it has shaped my entire life. This proposal will have a negative impact on both my family and me.

Sincerely,
Richard Corazza

[REDACTED]

Valdez, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I'm from Valdez, Alaska, where I hold PWS permits and work as a boat owner and captain. Growing up in Alaska's salmon hatchery industry, it has shaped my entire life. This proposal will have a negative impact on both my family and me.

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

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

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

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries

Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

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

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

Sincerely,
Richard Corazza

[REDACTED]

Valdez, Alaska

November 26, 2024

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

Dear Members of the Board of Fisheries,

I have been an Alaskan commercial fisherman for 46 years. Our family has 4 generations of experience in Alaskan fisheries. I started Seining in PWS in 1985 and both of my adult children have continued to seine in PWS with their own permits and seine vessels.

I have participated in cost recovery at the hatcheries in PWS. Without the great benefit of the hatcheries, I would not have been able to conduct a profitable fishery operation in many of the years since I started seining in PWS. Because of the relative stability that the hatcheries provided, I was able to make a living, support a family, support my community, start my children on a career path, and generate job opportunities for 4 crewmembers every year.

This proposal to ARBITRARILY decrease egg take levels by 25 percent has no basis in scientific fact. Fisheries science overuses modeling which is heavily affected by assumptions. We can send a man to the moon but can't explain where salmon go in the ocean or how they are affected by weather patterns or predation factors or myriad other factors that affect their survival. Assumptions can be affected by researcher bias and severely alter results. I don't believe science has proven that hatchery fish are detrimental to ocean productivity or detrimental to wild stocks.

Hatchery fish have been around for over 100 years, 46 of them in my lifetime. I have seen unexplainable highs and lows in salmon returns in all of these years. Some years the wild stocks return in great numbers and hatchery stocks do not. Some years it is opposite and hatchery stocks dominate the return. No one can explain this scientifically or accurately. With an industry that has a long running history of utilizing hatcheries with no scientifically proven detriments to ocean bearing capacity or wild stock abundance it is foolish to just start throwing darts at what may be the wrong target. There may be things to change in the hatchery system but not the slippery slope of decreasing production. Thank you for considering my thoughts.

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,

Richard Corazza

A solid black rectangular box used to redact the signature of Richard Corazza.

Homer, Alaska

November 26, 2024

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

Dear Members of the Board of Fisheries,

My family has been commercial fishing in Alaska since 1939 to the present and I personally drifted Cook Inlet for 30 years before I started seining for salmon with my husband Rich in Prince William Sound in 1985. I own my own Prince William Sound seine permit at present.

Personally and as a family the hatchery system in Prince William Sound has been of great benefit to us, especially because of the destruction of many natural salmon streams due to the 1964 earthquake. In many places, PWS land and islands raised anywhere from 6 ft to 30 ft which prevented ocean water and fish from reaching the streams, photos in the Valdez Museum show some of that destruction. The hatchery system helped the survival of wild salmon in PWS and supplemented the fisheries which helped the economy of the coastal towns of Alaska, including Valdez, Cordova, Whittier, Seward, Homer and even Anchorage and the Valley that also has a large population of salmon fishermen.

First, to decrease egg take levels by 25% assumes that all the salmon fry released make it to the ocean and scientific research has shown that is not true, in fact research at Southeast Alaska hatcheries showed that only 43% of the hatchery fry survived and that within the first week, not even taking into account ocean survival. In addition to that, Proposal 78 doesn't even mention the ongoing reality of marine mammals like sea lions and whales that are consuming large amounts of outgoing fry and incoming salmon. The large consumption of fry and salmon is documented every year and has hit a crisis level in the last 4 years with as many as 40 sea lions in front of each hatchery and great numbers of whales have discovered the hatchery fry in the spring.

No one should consider passing Proposal 78 without acknowledging and studying the impacts of these marine mammals on the numbers of hatchery fish. If this issue has not been addressed then there is a lack of understanding of the conditions within Prince William Sound. Add to that the ocean conditions and the foreign nations who also produce pink salmon then it is obvious that there are many factors affecting the fish in Alaska. And to be fair, having grown up in Cook Inlet and watching more and more sportsmen and dip netting happen on the Kenai River perhaps we should also be asking how such intense fishing on king salmon who are returning to their spawning river are surviving nets and outboard motor propellers and hooks.

To blame all the decline on the unknown factor of hatchery fish is unfair and unscientific. If PWS loses the hatchery program the effects will be devastating for Alaskan fishermen far and wide, not just the fishermen with the permits but also the towns that rely on their income, the deckhands, the tender and the processors plus all those businesses down the line that benefit

from the fish. Plus, not everyone realizes that commercial seiners pay for 73% of the entire hatchery stock of silvers for sportsmen, and those are expensive fish. Those numbers are authenticated by the Valdez Hatchery system.

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

Please review the following reasons why the Board should oppose and reject Proposal 78:

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

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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,

Sonja Corazza

A solid black rectangular box used to redact the signature of Sonja Corazza.

Homer, Alaska



CORDOVA DISTRICT
FISHERMEN
— UNITED —

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 and Upper Copper/Upper Susitna Finfish and Shellfish
(except shrimp) Meeting Proposals

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

Cordova District Fishermen United (CDFU) is an industry-based nonprofit strengthening commercial fishing in the Prince William Sound region by advocating for the needs of community-based fishermen. We are celebrating 90 years representing fishermen and their families for thriving fisheries that sustain regional ecosystems, communities, and ways of life - ensuring they are well informed, resourced, and mobilized to affect positive change for all harvesters in the region.

Proposals submitted in April by CDFU were thoughtfully developed since the 2021 BOF meeting cycle considering input through direct relationships with fishermen, processors, ADFG, PWS hatcheries, our RSDA, and other community stakeholders in Prince William Sound fisheries.

This fall CDFU hosted open gear group committees with Area E fishermen to develop position recommendations on proposals for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting, and advise its Board of Directors.

The slate of positions below represents a strong future for fishermen and a resilient regional economy built with good science, a shared burden of conservation and fair

opportunity for all user groups, productive hatcheries and adaptable management to create and sustain more small-scale, low-impact fisheries.

We respectfully ask you to consider our enclosed comments as you deliberate.

We want to thank each member of the Alaska Board of Fisheries for your time and consideration of our comments. We greatly appreciate your service and the attention to the issues facing our fleet and fisheries. Staff, CDFU Board of Directors, and gear group committees are available to further clarify anything regarding our comments. Please do not hesitate to reach out.

Sincerely,



Ezekiel Brown
Board President
ezekiel.k.brown@gmail.com



Jess Rude
Executive Director
director@cdfu.org

BOF Proposal Number	BOF Proposal Synopsis	CDFU Comments	Appendix with tables, graphs, etc.?
1	Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries	OPPOSE	
2	Reopen waters closed to the harvest of groundfish in Prince William Sound	SUPPORT	
3	Modify Prince William Sound groundfish pot specifications	SUPPORT	
5	Adopt a provision to close waters to specific groundfish gear types for rockfish conservation	OPPOSE	YES
6	Allow for release of rockfish in mechanical jig and hand troll fisheries	SUPPORT	
7	Establish gear specifications for directed lingcod fisheries in Prince William Sound	OPPOSE	YES
8	Modify the Prince William Sound pacific cod fishery guideline harvest level	SUPPORT	
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	
10	Modify pot limit in the Prince William Sound Pacific cod fishery	SUPPORT	
13	Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery	SUPPORT	
14	Close the Prince William Sound walleye pollock pelagic trawl fishery	NO POSITION	
15	Modify bycatch limits in the Prince William Sound pelagic trawl fishery	NO POSITION	
16	Close the Prince William Sound pelagic trawl fishery	NO POSITION	
17	Establish observer requirements in the Prince William Sound pelagic trawl fishery	NO POSITION	
19	Modify the commercial fishing season for sablefish in Prince William Sound	SUPPORT	
20	Modify the commercial fishing season for sablefish in Prince William Sound	SUPPORT	
22	Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound	SUPPORT	
23	Prohibit the retention of sablefish from state waters	SUPPORT	
25	Establish a personal use sablefish fishery in Prince William Sound	OPPOSE	
26	Establish a Prince William Sound groundfish personal use fishery	OPPOSE	
27	Modify rockfish bag and possession limits	SUPPORT	
28	Modify the rockfish area, bag and possession limit	OPPOSE	
29	Create additional provisions for yelloweye rockfish management	SUPPORT	
31	Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries	SUPPORT	YES
32	Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound	SUPPORT	
33	Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area	OPPOSE	
34	Repeal the Registration Area E Tanner crab harvest strategy	SUPPORT	YES
35	Modify the harvest strategy for Prince William Sound Tanner crab	SUPPORT	YES
36	Increase the pot limit in the Prince William Sound Tanner crab fishery	SUPPORT	
37	Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery	SUPPORT	
38	Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab	SUPPORT	
39	Establish season dates for a commercial golden king crab fishery in Prince William Sound	SUPPORT	YES
40	Adopt a harvest strategy for golden king crab in Prince William Sound	SUPPORT	
42	Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound	OPPOSE	
43	Establish a directed octopus fishery in Prince William Sound	SUPPORT	
46	Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery	SUPPORT	
47	Require inseason reporting in subsistence and personal use fisheries	SUPPORT	
48	Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict	OPPOSE	
49	Prohibit transport services in the Glennallen Subdistrict	SUPPORT	
51	Reduce commercial salmon fishing opportunity in the Copper River District	OPPOSE	YES

52	<i>Reduce commercial salmon fishing opportunity in the Copper River District</i>	OPPOSE	YES
53	<i>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</i>	OPPOSE	YES
55	<i>Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted</i>	SUPPORT	
56	<i>Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders</i>	NO POSITION	
57	<i>Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery</i>	NO POSITION	
58	<i>Amend the Copper River King Salmon Management Plan</i>	OPPOSE	
59	<i>Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan</i>	OPPOSE	
60	<i>Modify the annual limit for the Chitina Subdistrict</i>	SUPPORT	
61	<i>Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict</i>	SUPPORT	
62	<i>Allow inseason adjustment of the Copper River personal use maximum harvest level</i>	SUPPORT	
63	<i>Amend the opening date of the Chitina Subdistrict personal use fishery</i>	OPPOSE	
64	<i>Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year</i>	SUPPORT	
65	<i>Require a weekly permit and inseason reporting in the Chitina Subdistrict</i>	SUPPORT	
66	<i>Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal</i>	SUPPORT	
67	<i>Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict</i>	SUPPORT	
68	<i>Prohibit dipnetting from a boat in the Chitina Subdistrict</i>	SUPPORT	
69	<i>Establish restrictions when dipnetting from a boat in the Chitina Subdistrict</i>	SUPPORT	
70	<i>Extend the lower boundary of the Chitina Subdistrict</i>	OPPOSE	
71	<i>Prohibit guiding in the Chitina Subdistrict</i>	SUPPORT	
72	<i>Close sport fishing for salmon based on water temperature in the Gulkana River</i>	SUPPORT	
73	<i>Allow permit stacking by Prince William Sound commercial salmon purse seine permit holders</i>	NO POSITION	
74	<i>Allow permit stacking in the Prince William Sound commercial salmon purse seine fishery</i>	NO POSITION	
75	<i>Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan</i>	NO POSITION	
76	<i>Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan to increase access to the Port Chalmers Subdistrict by drift gillnet permit holders</i>	NO POSITION	
77	<i>Include salmon produced by Valdez Fishery Development Association in the Prince William Sound Management and Salmon Enhancement Allocation Plan</i>	NO POSITION	
78	<i>Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%</i>	OPPOSE	YES
79	<i>Close Main Bay to all fishing during hatchery cost recovery operations</i>	SUPPORT	YES
80	<i>Manage the Main Bay sport fishery based on the hatchery corporate escapement goal</i>	SUPPORT	YES
81	<i>Modify the area open to sport fishing near the Main Bay Hatchery</i>	SUPPORT	YES
83	<i>Allow a resident sport angler to use two rods when fishing for salmon</i>	OPPOSE	
84	<i>Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel</i>	SUPPORT	YES
85	<i>Modify the bag and possession limit for coho salmon</i>	OPPOSE	
86	<i>Modify the sport fishing area and season dates in Ibeck Creek</i>	SUPPORT	
87	<i>Modify the sport fishing area and season in a Copper River Delta system</i>	SUPPORT	
88	<i>Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed</i>	SUPPORT	
96	<i>Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation</i>	SUPPORT	

97	<i>Reduce the minimum herring spawning biomass threshold</i>	SUPPORT	YES
98	<i>Align Prince William Sound herring and salmon management area descriptions</i>	SUPPORT	
99	<i>Define commercial herring fishery districts in Prince William Sound</i>	SUPPORT	YES
100	<i>Adopt a Kayak Island District herring management plan</i>	SUPPORT	
102	<i>Allow commercial fishery permit holders to harvest herring for the own use as bait</i>	SUPPORT	

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.

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. ADFG opposed this proposal in part due to the low harvest of Pacific cod in this area. However there is a high level of harvest by hooks for halibut and black cod in the pot closure area that could potentially switch to pots if this proposal were to pass.

Proposal 3 - SUPPORT

Modify Prince William Sound groundfish pot specifications

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

Proposal 5 - OPPOSE

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

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.

Included in appendix, pages 1-3:

- Alaska Sport Fishing Survey Regional Summary Estimates in numbers, 2014-2023
- Alaska Sport Fishing Survey Regional Summary Estimates in numbers, 1996-2005
- Table 3, PWS commercial rockfish harvest by gear type in pounds, 1988-2019
- Table, PWS Rockfish GHL and Harvest, 2010-2024

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.

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.

Included in appendix, page 4:

- Table, PWS Lingcod GHL and Harvests, 2012-2024.

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.

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 collapsible 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. We are working to develop alternative language for this proposal that would allow for a slinky pots fishery to occur during the parallel season and retain allocation for jig and handtroll.

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".

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.

Proposals 14, 15, 16, 17 - COMMENT

- Close the Prince William Sound walleye pollock pelagic trawl fishery.***
- Modify bycatch limits in the Prince William Sound pelagic trawl fishery.***
- Close the Prince William Sound pelagic trawl fishery.***
- Establish observer requirements in the Prince William Sound pelagic trawl fishery.***

CDFU did not take a position on Proposals 14-17, which seek to close or modify the regulations for the PWS pollock pelagic trawl fishery. We have concerns about bycatch in this fishery, however pollock are predators on salmon and herring fry. At this time ADFG has not yet shared data to best understand the trawl fishery impacts. We urge the BOF to exercise caution on drastic proposals such as these and ask that any actions taken on this fishery are taken incrementally.

Neither the BOF or ADFG have been granted the authority to require electronic monitoring aboard vessels. CDFU does not support any such requirements without sufficient guardrails to prevent excessive burden on small boat fishermen. CDFU supports increased observer coverage placed upon these vessels only if paired with a hard rockfish bycatch cap. Rockfish harvest in the pelagic trawl fishery is included in the 150,000lb GHL for rockfish in PWS harvested by all commercial fisheries. Under current regulation, it is theoretically possible for the TAC for this fishery to grow large enough that the Pollock trawl fleet could catch the entire GHL for rockfish in January and force closures of other statewaters groundfish fisheries that our members participate in.

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.

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.

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

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

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

Proposal 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.

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.

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.

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.

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.

Included in appendix, page 5:

- Figure 7 from “Bottom Trawl Surveys for Tanner Crab in PWS, 2017-2019” showing the location of male Tanner crab.

Proposal 32 - SUPPORT

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

ADFG continues to assert that it needs a stock assessment program to allow for a Dungeness fishery in PWS, despite allowing Dungeness fisheries throughout Alaska with no stock assessments.

Kodiak and westward saw similar decline to PWS's Dungeness crab populations throughout the early 2000's, with harvest declining to 69,001 lbs in 2013. Despite that low harvest and a CPUE of 2 in 2013, the Kodiak fishery never closed. It is now booming, with multiple harvests of more than 2 million pounds per year in the last 5 years.

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.]

- (1) Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31
- (2) the daily bag and possession limit is 5 crab per person
- (3) 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;
- (4) 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
- (5) 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.

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.

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.

Figure 1 shows areas defined in the current harvest strategy, which has no defined area or harvest strategy for most outside waters or northern and western PWS. The shaded areas on the map show historic trawl survey locations.

Figure 8 from the 2021 PWS Trawl survey in Area 3 shows catches of legal male Tanner crab. That year in the 57 tows the total catch of legal males was 26, which resulted in an abundance estimate of 40,289 legal crab. This science is flawed. It's evident there are more than 40,000 legal crab in Area 3. The Commissioner's permit fishery harvested an average of 33,642 crab every year in just one portion of this area from 2018-2021. Trawl surveys in PWS are ineffective at making population estimates. ADFG staff comments state "Abundance estimates from the trawl survey decreased by 65% from these levels down to ~75,000 legal male crab in 2018 and ~63,000 legal male crab in 2019." 2019 was the second year the Commissioner's permit fishery was allowed in a small portion of the area. That year harvested 74,405 crab more than the department trawl survey results indicated was in the entirety of Area E. The following year, 2021, the Commissioner's permit fishery harvested 77,474 crab.

During the 2022 test fishery that occurred in Area 3 (shown in Figure 2022 PWS Tanner Crab Test Fishery Harvest), the vessel easily caught the 5000 lb quota with a CPUE of >30 legal male crab per pot. Note that Areas B, D, E and F in the chart are not part of the PWS Tanner crab harvest strategy, and are not surveyed with no mechanism to be opened.

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.

Included in appendix, pages 6-8:

- Figure 1, Northeastern, Central, and Southwestern PWS Tanner Crab Districts
- Figure 8, Catches of legal size and historical legal size male Tanner crab from the 2021 PWS Area trawl survey in Area E
- Table 3, PWS Commissioner's Permit Tanner crab fishery harvest and effort information by statistical area, 2018-2021
- Figure, 2022 PWS Tanner Crab Test Fishery Harvest

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.

Included in appendix, pages 9-28:

- “Recommended Harvest Strategy for Southeast Alaska Golden King Crab”.

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.

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. There are currently open access tanner crab fisheries which harvest small GHLs in Chignik and the South peninsula. ADFG does not have authority to adjust pot limits in either of these fisheries by EO.

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. ADFG has the ability to manage a fishery in which fishery participants can also be tender vessels. Under the transporter regulation, it does this in the Kodiak Dungeness fishery and every salmon fishery in the state.

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

Photos included show the amount of Golden King crab encountered during the Commissioner’s permit fishery for Tanner crab, the King crab test fishery, and subsistence fishing. 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.

Included in appendix, pages 9-30:

- “Recommended Harvest Strategy for Southeast Alaska Golden King Crab”
- Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season.
- Photos, King Crab caught during the Commissioner’s permit Tanner crab fishery and subsistence fishing
- Photo, Golden King crab caught during Commissioner’s permit Tanner crab fishery
- Photo, King crab caught during 2020 King crab test fishery

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.

ADFG comments that “The harvest rates in these fishery and assessment programs suggest that there likely is not a commercially harvestable surplus of Golden King crab.” However Southeast Alaska has a commercial Golden King crab fishery that occurs with harvest rates the same or lower than have been seen in PWS in recent decades. The Southeast fishery also occurs without a fishery independent stock assessment.

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.

Proposal 42 - OPPOSE

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

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

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

Proposal 43 - SUPPORT

Establish a directed octopus fishery in Prince William Sound.

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

Proposal 46, 47 - SUPPORT

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

-Require inseason 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 realtime 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.

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.

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.

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.

Included in appendix, page 31:

- Figure A8, Minimum and maximum inriver sonar goal versus actual daily and cumulative salmon passage, Miles Lake sonar, 2013

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.

Proposal 56, 57 - COMMENT

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

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

CDFU membership did not have a consensus on these proposals and therefore did not take a position. Proposals 56 and 57 would create a permit stacking regulation for the drift fleet where a fisherman who holds two permits could fish a 200 fathom net, or allow two permit holders to operate a 200 fathom net from the same vessel.

Proposal 58 - OPPOSE

Amend the Copper River King Salmon Management Plan.

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

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

Proposal 59 - OPPOSE

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

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

Personal use dip netting is not species-discriminative. Passing this proposal will mean 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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

Proposals 73, 74 - COMMENT

-Allow permit stacking by Prince William Sound commercial salmon purse seine permit holders

-Allow permit stacking in the Prince William Sound commercial salmon purse seine fishery

CDFU membership did not have a consensus on these proposals and therefore did not take a position. Under current regulation, seine permit stacking must be in the names of two different persons on the same vessel. Proposals 73 and 74 would modify the permit stacking regulation for the purse seine fishery that was passed at

the 2021 BOF meeting by expanding it to allow one fisherman who holds two permits to fish a total net length of 250 fathoms.

Proposals 75, 76, 77 - COMMENT

-Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan

-Amend the Prince William Sound Management and Salmon Enhancement Allocation Plan to increase access to the Port Chalmers Subdistrict by drift gillnet permit holders

-Include salmon produced by Valdez Fishery Development Association in the Prince William Sound Management and Salmon Enhancement Allocation Plan

These proposals are allocative and therefore CDFU did not take a position.

Proposals 75, 76, and 77 seek to amend the Prince William Sound Management and Salmon Enhancement Allocation Plan to adjust the allocation of salmon between commercial fishing gear types.

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.

Included in appendix, pages 32-46:

- Economic Impact of the Prince William Sound Aquaculture Corporation, 2018
- Economic Impact of Alaska Salmon Hatcheries, 2024

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.

Included in appendix, page 47:

- Table 80-1, Main Bay Harvest for commercial, sport and subsistence fisheries and Main Bay Hatchery broodstock collection and cost recovery, PWS Management Area, 2014-2023.

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.

Included in appendix, page 47:

- Table 80-1, Main Bay Harvest for commercial, sport and subsistence fisheries and Main Bay Hatchery broodstock collection and cost recovery, PWS Management Area, 2014-2023.

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.

Included in appendix, page 47:

- Table 80-1, Main Bay Harvest for commercial, sport and subsistence fisheries and Main Bay Hatchery broodstock collection and cost recovery, PWS Management Area, 2014-2023.

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?

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.

Included in appendix, page 48:

- Alaska Sport Fishing Survey, Regional Summary Estimates, 2014-2023

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.

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.

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.

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.

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 the dilemma that exists in other Alaska herring fisheries.

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.

Included in appendix, page 49:

- Table, Herring Biomass over time
- ICES Study "Management strategy evaluation of harvest control rules for Pacific Herring in Prince William Sound, Alaska"

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.

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.

Included in appendix, pages 50-51:

- Photos, herring spawn at Kayak Island

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.

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:*
-

Appendix for Proposal 5 - OPPOSE

ADF&G Home » Sport Fishing Survey » Southcentral Alaska » 2014-2023 Rockfish harvest summary


Alaska Sport Fishing Survey

Regional Summary Estimates

Study Years: 2014-2023 ▾

Estimates of Southcentral Alaska sport Rockfish harvest, 2014–2023.

SOUTHCENTRAL	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
(J) North Gulf Coast/Prince William Sound	88,009	90,767	113,324	72,667	76,663	96,852	84,578	96,362	99,569	68,034
(K) Knik Arm	0	0	0	0	0	0	0	0	0	0
(L) Anchorage	0	0	0	0	0	0	0	0	0	0
(M) Susitna River drainage	0	0	0	0	0	0	0	0	0	0
(N) West Cook Inlet drainages	0	0	0	0	0	0	0	0	0	0
(PF) Kenai Peninsula freshwater	0	0	0	0	0	0	0	0	0	0
(PS) Cook Inlet saltwater	22,622	26,218	32,905	32,254	40,149	47,793	32,201	48,434	48,284	41,334
(PU) Kenai Peninsula Personal Use Dipnet										0
(PX) Cook Inlet (Shellfish only)	0	0	0	0	0	0	0	0	0	0
(Q) Kodiak	29,733	25,786	26,339	23,448	26,513	27,531	14,431	34,238	31,411	28,484
(R) Alaska Peninsula/Aleutian Islands	1,444	2,086	1,023	339	1,970	1,929	1,093	557	647	568
(S) Kvichak River drainage	0	0	0	0	0	0	0	0	0	0
(T) Nushagak, Wood River and Togiak	0	0	0	0	0	0	0	0	0	0
Southcentral Total	141,808	144,857	173,591	128,708	145,295	174,105	112,303	179,591	179,911	138,420

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ADF&G Home » Sport Fishing Survey » Southcentral Alaska » 1996-2005 Rockfish harvest summary

Alaska Sport Fishing Survey

Regional Summary Estimates

Study Years: 1996-2005 ▾

Estimates of Southcentral Alaska sport Rockfish harvest, 1996–2005.

SOUTHCENTRAL	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
(J) North Gulf Coast/Prince William Sound	33,837	35,789	34,308	36,893	47,828	48,364	56,240	48,503	73,947	63,985
(K) Knik Arm	0	0	0	0	0	0	0	0	0	0
(L) Anchorage	0	0	0	0	0	0	0	0	0	0
(M) Susitna River drainage	0	0	0	0	0	0	0	0	0	0
(N) West Cook Inlet drainages	0	0	0	0	0	0	0	0	0	0
(PF) Kenai Peninsula freshwater	0	0	0	0	0	0	0	0	0	0
(PS) Cook Inlet saltwater	5,195	4,491	4,004	6,229	6,124	4,626	5,835	7,515	9,756	11,607
(PU) Kenai Peninsula Personal Use Dipnet										
(PX) Cook Inlet (Shellfish only)	0	0	0	0	0	0	0	0	0	0
(Q) Kodiak	6,551	6,164	4,545	5,480	7,125	5,506	7,556	6,166	7,844	15,392
(R) Alaska Peninsula/Aleutian Islands	582	1,689	436	138	1,430	745	1,018	678	933	2,759
(S) Kvichak River drainage	0	0	0	0	0	0	0	60	0	0
(T) Nushagak, Wood River and Togiak	0	0	0	0	0	0	0	0	0	0
Southcentral Total	46,165	48,133	43,291	48,740	62,507	59,241	70,649	62,922	92,480	93,743

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Table 3.—Prince William Sound Area commercial rockfish harvest by gear type, including black and dark rockfish from federal waters, 1988–2019.

Year	Vessels	Landings	Harvest (lb)					Pots
			Jig	Trawl	Trawl %	Longline	Longline %	
1988	80	195	54,097	228,417	54%	144,228	34%	0
1989	39	103	^a	997	1%	104,633	99%	0
1990	96	402	30,088	20,238	4%	455,789	90%	^a
1991	89	247	15,624	11,162	7%	129,864	83%	0
1992	114	299	9,946	28,510	15%	152,945	80%	^a
1993	80	209	13,905	12,610	12%	81,978	76%	^a
1994	92	211	94,588	^a		104,799	53%	^a
1995	148	284	168,777	267	0%	127,616	43%	^a
1996	99	257	57,103	3,507	2%	124,077	67%	0
1997	106	266	34,047	1,294	1%	130,141	79%	^a
1998	88	220	2,903	1,079	1%	104,889	96%	^a
1999	92	244	1,130	1,951	3%	68,906	96%	0
2000	100	284	2,401	2,061	2%	117,210	96%	247
2001	101	233	1,165	4,495	6%	68,400	92%	^a
2002	87	190	0	30,553	41%	44,059	59%	0
2003	89	243	256	4,752	10%	42,982	90%	0
2004	71	197	283	3,735	7%	48,783	92%	0
2005	80	206	^a	8,863	15%	51,547	85%	0
2006	72	226	1,008	12,391	16%	62,866	82%	^a
2007	73	213	1,215	10,970	13%	69,419	85%	0
2008	71	207	^a	21,656	20%	85,113	80%	0
2009	88	256	^a	22,359	19%	95,663	81%	^a
2010	87	262	^a	6,500	6%	98,117	94%	^a
2011	81	232	^a	8,113	7%	110,497	93%	^a
2012	94	245	881	18,054	16%	94,587	83%	^a
2013	85	278	^a	29,680	20%	119,561	80%	^a
2014	90	211	0	69,132	44%	88,419	56%	0
2015	79	280	0	23,293	15%	128,835	85%	0
2016	87	265	966	25,110	16%	135,436	84%	^a
2017	66	202	433	4,413	7%	54,859	92%	^a
2018	91	203	129	4,402	8%	51,920	92%	0
2019	100	230	865	9,715	14%	61,307	85%	^a
Average								
2010–2019	86	241	468	19,841	15%	94,354	84%	0
2017–2019	86	212	476	6,177	10%	56,029	90%	0

Prince William Sound Rockfish

Guideline harvest level (GHL) and Harvest are round weight in pounds.

Year▲▼	GHL	State Managed Harvest
2024	150,000	122,737
2023	150,000	163,254
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.

Appendix for Proposal 7 - OPPOSE

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Prince William Sound Lingcod

Guideline Harvest Level (GHL) and Harvest weight in pounds.

Year	GHL	DISTRICT	Harvest
2024	7,300	INSIDE	3,701
	25,300	OUTSIDE	23,250
2023	7,300	INSIDE	5,483
	25,300	OUTSIDE	24,146
2022	7,300	INSIDE	5,692
	25,300	OUTSIDE	19,475
2021	7,300	INSIDE	2,341
	25,300	OUTSIDE	20,002
2020	7,300	INSIDE	3,052
	25,300	OUTSIDE	22,795
2019	7,300	INSIDE	7,388
	25,300	OUTSIDE	19,020
2018	7,300	INSIDE	6,688
	25,300	OUTSIDE	22,867
2017	7,300	INSIDE	460
	25,300	OUTSIDE	12,162
2016	7,300	INSIDE	404
	25,300	OUTSIDE	13,690
2015	7,300	INSIDE	2,968
	25,300	OUTSIDE	17,396
2014	7,300	INSIDE	4,199
	25,300	OUTSIDE	11,672
2013	7,300	INSIDE	1,527
	25,300	OUTSIDE	28,804
2012	7,300	INSIDE	4,114

Appendix for Proposal 31 - SUPPORT

Source: "Bottom Trawl Surveys for Tanner Crab in Prince William Sound, 2017–2019"

Closure area is north and east of red lines

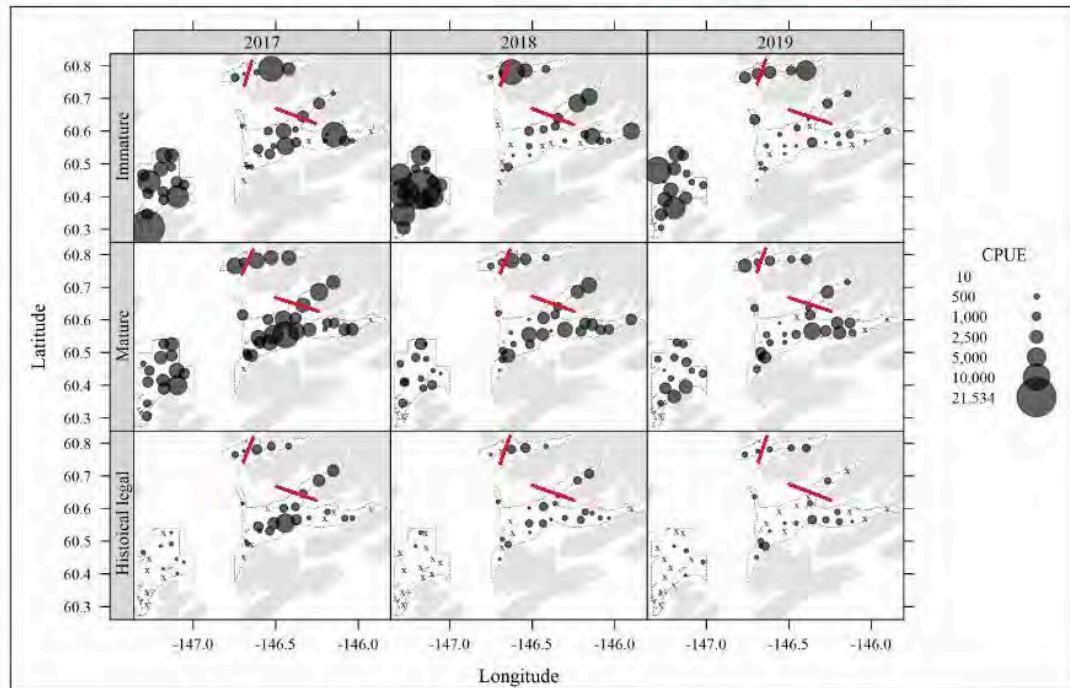
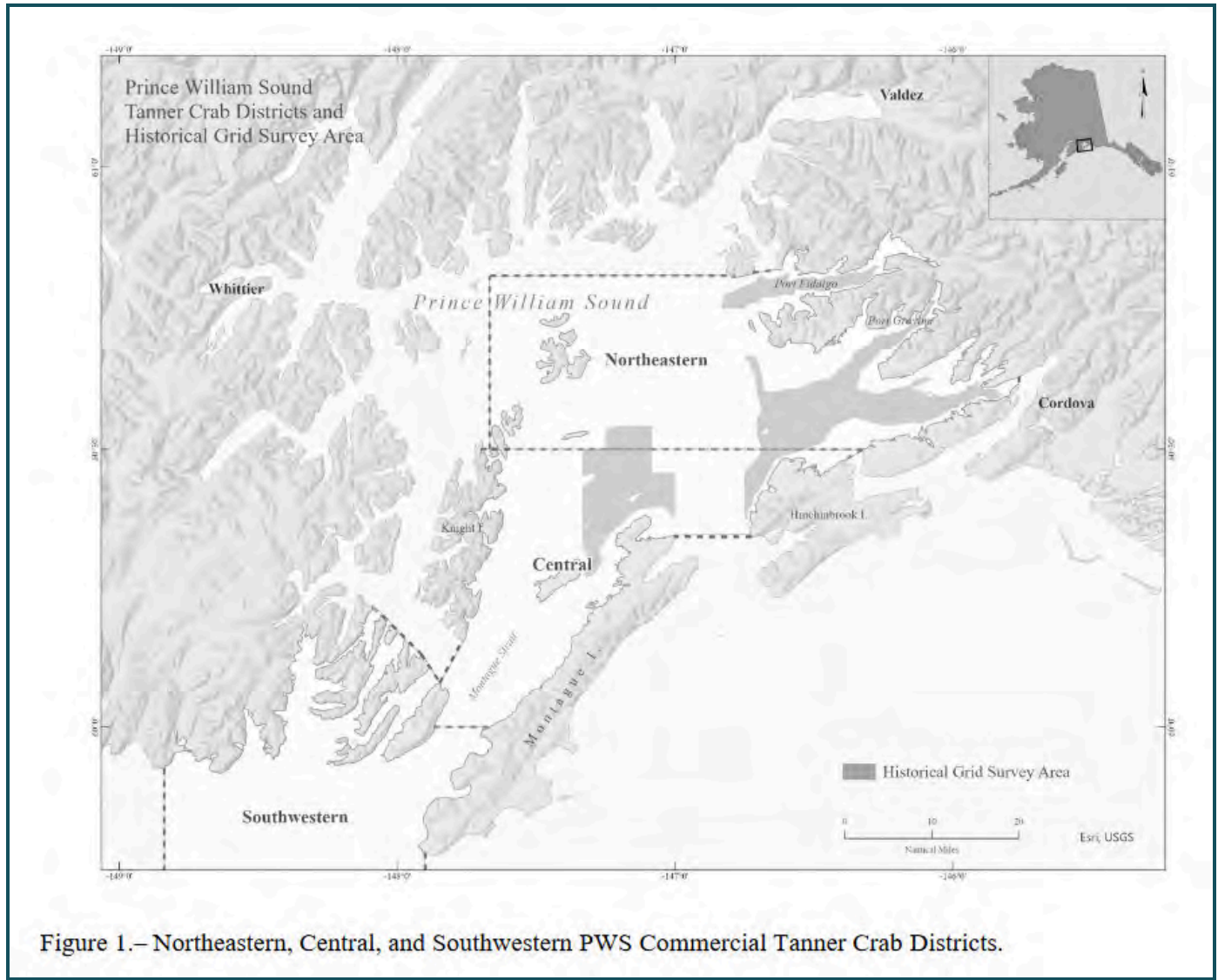


Figure 7.—Location of male Tanner crab caught in the 2017–2019 Prince William Sound Area trawl surveys.

Note: CPUE is crab per square nautical mile.

Appendix for Proposal 34 - SUPPORT



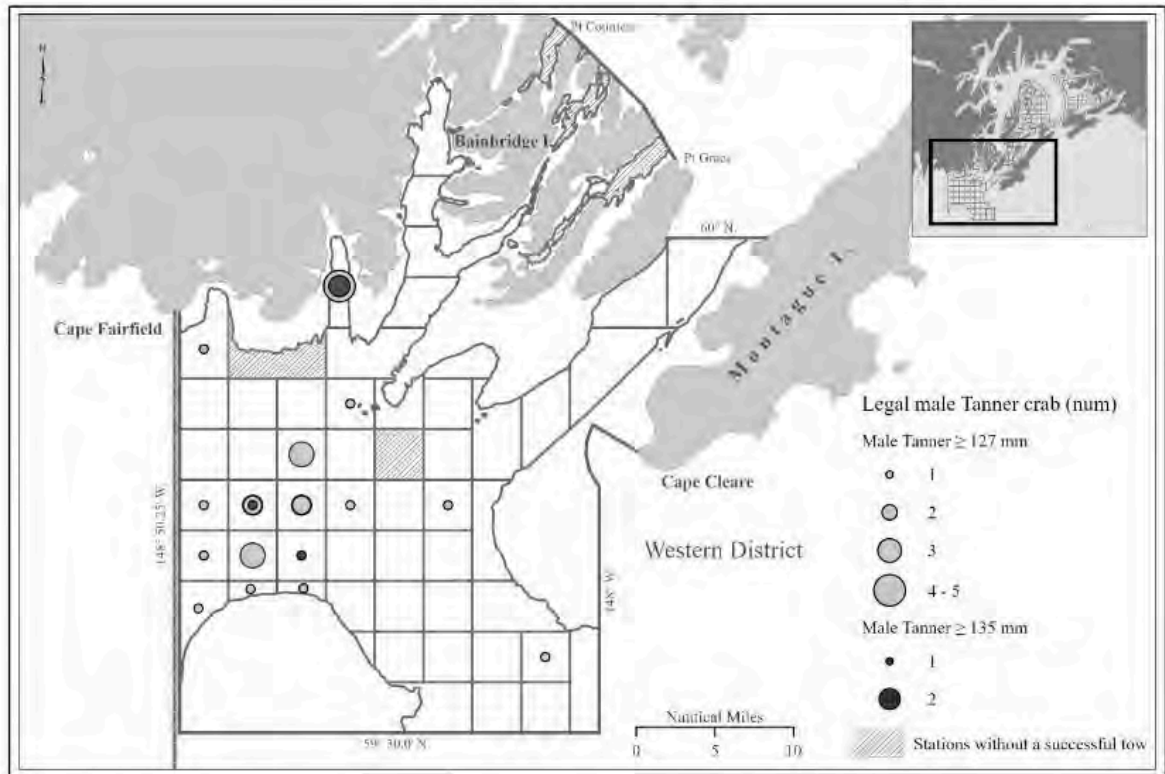
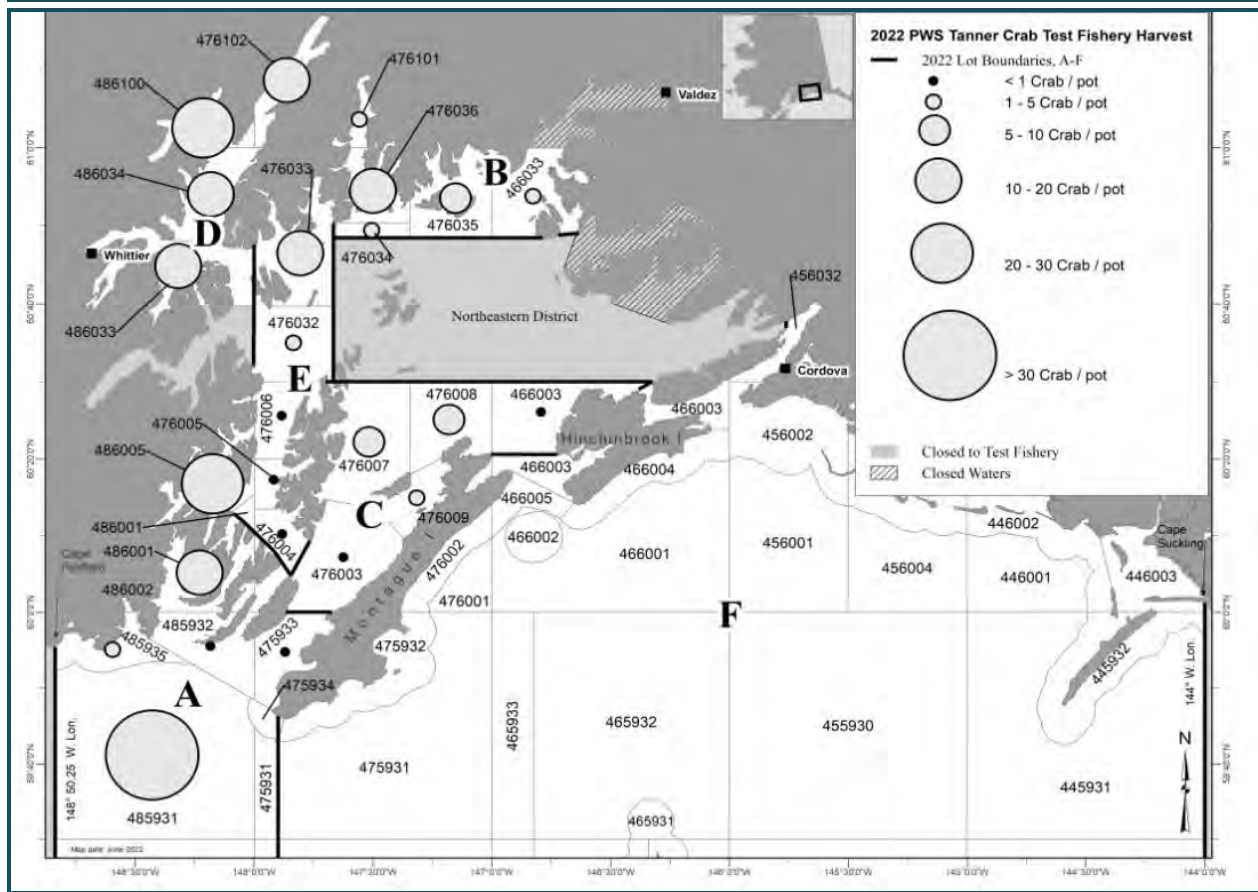


Figure 8.—Catches of legal-size (≥ 127 mm) and historical legal-size (≥ 135 mm) male Tanner crab from the 2021 Prince William Sound Area trawl survey in Area 3.

Table 3.–Prince William Sound Commissioner's Permit Tanner crab fishery harvest and effort information by statistical area, 2018–2021.

Statistical Area 486005						
Year	Pot lifts	Harvest (No. of crab)	Harvest (lb)	CPUE (crab per pot)	Vessels	Percent of total harvest
2018	1,071	14,868	29,853	13.9	11	36%
2019	551	5,324	10,254	9.7	9	8%
2020	588	3,560	7,088	6.1	10	7%
2021			Closed			
Average	737	7,917	15,732	9.9	10	17%
Statistical Area 485931						
2018	732	16,036	25,813	21.9	3	31%
2019	2,635	51,994	83,837	19.7	9	67%
2020	2,873	39,436	65,948	13.7	15	61%
2021	1,862	27,099	45,111	14.6	8	80%
Average	2,026	33,642	55,177	17.5	9	59%



Appendix for Proposal 35 - SUPPORT**Appendix for Proposal 39 - SUPPORT**

Recommended Harvest Strategy for Southeast Alaska Golden King Crab (*Lithodes aequispinus*)

by

Andrew Olson—Southeast Alaska Groundfish-Shellfish Coordinator

Alaska Department of Fish and Game, Division of Commercial Fisheries, Douglas
and

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BACKGROUND

The Alaska Department of Fish and Game (Department) golden king crab (GKC) fishery in Southeast Alaska is a data-limited fishery that is managed based on a 3-S management system (sex, size, and season). The management has been further developed by limiting the number of participants and gear, establishing guideline harvest levels (GHLs) that are set within guideline harvest ranges (GHRs) for each management area (Table 1), and allowing closure of management areas if there are stock health concerns. Most of the harvest occurs in the commercial sector where the fishery extends across seven management areas (Northern, Icy Strait, North Stephens Passage, East Central, Mid and Lower Chatham Strait, and Southern). The Department annually evaluates stock status and establishes GHLs for each management area using fishery dependent data (Stratman et al. 2017; Olson et al. 2018).

The commercial GKC fishery rapidly developed after the collapse of the red and blue king crab fisheries in the early 1980s. Harvest subsequently peaked in the late 1980s and early 2010s, experiencing a period of collapse in the 1990s. Harvest has been steadily declining since 2011 and many of the management areas are currently closed due to historically low fishery performance (Stratman et al. 2017; Olson et al. 2018; Stratman 2020).

Table 1.—Golden king crab guideline harvest ranges for Registration Area A [5 AAC 34.115].

Management Area	Guideline Harvest Range (lbs)
Northern	0–145,000
Icy Strait	0–55,000
North Stephens Passage	0–25,000
East Central	0–225,000
Mid-Chatham Strait	0–150,000
Lower Chatham Strait	0–50,000
Southern	0–25,000

BIOLOGY

Golden king crab are relatively long-lived slow growing species that have an asynchronous 20-month reproductive cycle (Somerton and Otto 1986; Long and Van Sant 2016), morphometric maturity at approximately 8 years of age (Koeneman and Buchanan 1985; Paul and Paul 2001; Hebert et al. 2008), lecithotrophic larvae that remain at depth (Sloan 1985; Shirley and Shijie 1997; Long and Van Sant 2016). Golden king crab exhibit spatial variability in size at maturity across the North Pacific and among the seven management areas within Southeast Alaska where size at maturity increases with increases in latitude (Jewett et al. 1985; Somerton and Otto 1986; Nizyaev 2005; Olson et al. 2018). Certain aspects of this species' life history are well documented whereas other critical components such as, growth rates, age at maturity, longevity, etc. are unknown.

PURPOSE

The purpose of this document is to lay the framework for a consistent and transparent inseason and postseason approach to determine GHLs and close fisheries when warranted. The harvest strategy described herein remains consistent with the Board of Fisheries' Policy on King and Tanner Crab Resource Management (90-04-FB, March, 1990) [5 AAC 34.080], the Southeast Alaska Golden King Crab Management Plan [5 AAC 34.114], and will be treated as a guideline for managing GKC and not a prescriptive step by step approach. Many factors and sources of information can affect determining GHLs or closing of fisheries that cannot be captured in a prescriptive framework.

MANAGEMENT GOALS AND OBJECTIVES

The primary goal and objective is to recommend a harvest strategy for Southeast Alaska GKC to improve and stabilize fishery performance using transparent and repeatable metrics (and their rationale) to evaluate stock health and measure performance for more consistent inseason and postseason management. Additional goals and objectives include minimizing and mitigating ecological risks from fishing related activities, maintaining various size and age compositions of stocks in order to maintain long-term reproductive viability; minimizing handling and unnecessary mortality of non-legal GKC and non-target species; and reducing dependency on annual recruitment.

Harvest strategies have been implemented for the GKC fisheries in the Aleutian Islands and Pribilof Islands to improve fisheries management and sustainability. These harvest strategies are comprised of biological, fishery dependent and independent reference points (i.e. mature male biomass, CPUE, annual recruitment, etc.) that are used in recommending the total allowable catch (TAC) or GHL for a given management area and season (Daly et al. 2019; Daly and Jackson 2020; Siddeek et al. 2020).

PROPOSED PLAN

Here we propose a harvest strategy plan that informs inseason and postseason management using fishery dependent performance indicators and management decision rules.

Performance Indicators

The primary performance indicator used in this harvest strategy is commercial catch rate defined as logbook catch of GKC per unit of effort (CPUE):

$$CPUE_{le} = \frac{catch}{effort} \quad (1)$$

where $CPUE$ is the catch of legal size male GKC per unit of *effort (pot lifts)* for each logbook entry (le). Equation (1) is then applied to all logbook entries and averaged for a given management area and season where:

$$\overline{CPUE}_{a,s} = \frac{\sum CPUE_{le}}{n} \quad (2)$$

where a is a given management area, s is a given season, and n is the total number of logbook entries. Future iterations will incorporate soak time in order to standardize CPUE.

Due to the GKC and Tanner crab fishery occurring concurrently, it is difficult to differentiate between GKC that are harvested as bycatch or directly targeted. GKC that are harvested as bycatch can bias logbook CPUE and consequently trigger management actions during and after the season. To evaluate this concern a proportion of $\geq 60\%$ will be applied to GKC catch from commercial logbooks:

$$catch_{le}^{\geq 0.6} = \frac{crab_{gkc}}{(total\ crab_{gkc+tc})} \quad (3)$$

where $catch$ is for a given logbook entry (le), gkc is golden king crab and tc is Tanner crab. Then subsequently Equations (1) and (2) will be applied to calculate CPUE.

A secondary performance indicator that will be used in this harvest strategy is commercial catch rate obtained from fish ticket data. With fish ticket data, CPUE is calculated using each harvest landing for the entire season divided by the difference between the first and last catch date (which is defined as active fishing season). This secondary CPUE indicator is defined as "pounds per pot day" and will aid in understanding catch rates over time:

$$active\ fishing\ season(days) = (date_{first\ catch} - date_{last\ catch}) \quad (4)$$

$$CPUE_f = \frac{harvest(lbs)}{active\ fishing\ season(days)} \quad (5)$$

where $CPUE$ is the harvest (lbs) per day for each fish ticket landing (f). Equation (5) is then applied to all fish ticket landings and averaged for a given area and season where:

$$\overline{CPUE}_{a,s} = \frac{\sum CPUE_f}{n} \quad (6)$$

where a is a given management area, s is a given season, and n is the total number of fish ticket landings.

Supplementary information that may be evaluated in this harvest strategy includes biological, local ecological knowledge (LEK), and other anecdotal information that may not be captured quantitatively in this harvest strategy framework.

- Biological information will be evaluated by analyzing carapace length (CL) mm frequencies by area and season for recruit classes of GKC sampled during commercial landings. Size of GKC is defined as the CL measurement. Recruit class is used as an indicator of shell age and is defined as recruit (new shell and a CL of 151–166mm) and postrecruit (new or old shell and a CL ≥ 167 mm).

- LEK is experiential information from fishermen and the fishing industry about the natural environment as it pertains to GKC. LEK will be evaluated and reviewed through permit holder comments in logbooks, communication with permit holders and industry representatives, and discussion at annual industry meetings (Ainsworth 2011; Beaudreau and Levin 2014). Examples of LEK include lots of crab (recruits, females, and undersized), females with full clutches, softshell, sand fleas, bad weather, large tides, and parasitized crab.

Reference Points

The primary indicator Target Reference Point (RP_{targ}) for each management area and is set at the average logbook CPUE for the years 2000-2017 because these years capture logbook requirements for the fishery in 2000 and represents contrasting data (highs and lows) in fishery performance. The exception to this includes North Stephens Passage (excludes 2000) and Lower Chatham (excludes 2013) due to having substantial outliers in those given years that influenced the Target Reference Point. The Trigger Reference Point (RP_{trig}) is set between the Target and Limit Reference Point that prompts management actions and is set at 75% of the RP_{targ} . The Limit Reference Point (RP_{lim}) is set at the level at which stocks are considered in a danger zone and are no longer resilient to fishing pressure and is set at 50% of the RP_{targ} .

MONITORING STRATEGY

Herein lies a monitoring strategy with associated decision rules for inseason and post season management of GKC.

Decision Rules

As the primary performance indicator is the most readily available estimate of fishery performance the following decision rules will guide inseason and postseason management decisions.

Inseason

- Fishery performance will be assessed biweekly and/or with a minimum requirement of 500 pot lifts before taking management action whichever is the least restrictive under the following guidelines:
 - If logbook CPUE is $\geq RP_{\text{targ}}$ manage to GHL.
 - If logbook CPUE is $\geq RP_{\text{trig}}$ but $< RP_{\text{targ}}$ manage to GHL and monitor closely.
 - If logbook CPUE is $\geq RP_{\text{lim}}$ and $< RP_{\text{trig}}$ fishery close early.
 - If logbook CPUE is $< RP_{\text{lim}}$ close fishery early **and** subsequent closure of management area for a minimum of 1 year for commercial and personal use fisheries the following season, depending upon a postseason review.
- GHLs will not be changed inseason and are only subject to change per postseason decision rules.

Postseason

Increase in a GHL

- If the most recent logbook CPUE is $>$ than the most recent previous season and is $> RP_{\text{targ}}$ the GHL may increase up to a maximum of 20% the following season.
- If the most recent logbook CPUE is $>$ than the most recent previous season and $\leq RP_{\text{targ}}$ and $> RP_{\text{trig}}$ the GHL may increase up to a maximum of 10% the following season.
- If the most recent logbook CPUE is $>$ than the most recent previous season and is $\leq RP_{\text{trig}}$ and $> RP_{\text{limit}}$ the GHL may increase up to a maximum of 5% the following season.
 - New GHLs may not exceed respective management area GHRs.

Decrease in a GHL

- **If the fishery closed short of a GHL inseason due to poor fishery performance and/or the most recent CPUE is $<$ than the previous season the GHL will be decreased based on the following conditions:**
 - If CPUE is $<$ than the most recent previous season and is $> RP_{\text{trig}}$ and $\leq RP_{\text{targ}}$ the GHL may be reduced up to a maximum of 40% the following season.
 - If the fishery closed short in-season due to poor fishery performance and CPUE is $<$ than the most recent season and $> RP_{\text{lim}}$ then the GHL decrease the following season may be within 20% of the total harvest at the time of closure during the most recent previous season, but not less than 7,500 lbs.

Closure and Re-opening

- If logbook CPUE is $< \text{RP}_{\text{lim}}$ further management action may be required by implementing an area closure of a minimum of 1 year to reduce the risk of localized depletion.
- Upon re-opening an area after a closure, the GHL will be equal to the harvest at the time of closure rounded to the nearest 1,000 lbs and must not be less than 7,500 lbs whichever is greatest.

Review of GHLs or Decision Rules

If and when new information becomes available indicating that the harvest strategy framework and GHL setting decision rules are not consistent with the Board's policy of managing a sustainable GKC resource, the decision rules must be reviewed and the reference points must be adjusted accordingly.

Other Considerations for Management and Future Recommendations

Logbook CPUE currently lacks a soak time data field and cannot be standardized for comparison across years. Soak time was introduced as a reporting field in logbooks for the 2020 fishing season and will be used to inform this harvest strategy in future iterations. This harvest strategy may be amended in future iterations as more information and tools become available. This harvest strategy is a first step to increase transparency regarding management metrics utilized for inseason and postseason decisions. We recommend that this harvest strategy is further developed using a management strategy evaluation (MSE). A MSE is a tool that uses simulation to test how well a harvest strategy performs and if the objectives of the harvest strategy are being achieved (Punt et al. 2016; Goethel et al. 2019).

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MANAGEMENT AREA REPORTS

Each management area report will provide an overview of seasonal trends in fishery performance through the most recent season. This includes comparing harvest (lbs) to corresponding GHs, logbook CPUE compared to reference points (i.e. target, trigger, and limit), reviewing Tanner crab harvest influence, and spatial distribution of incidental catch during the annual Tanner crab stock assessment survey in Holkham Bay. Confidential harvest and effort data have been excluded from figures if less than 3 permit holders participated in a given management area for a given year.

NORTHERN

Season Overview

The Northern management area was closed for the 2019 and 2020 seasons.

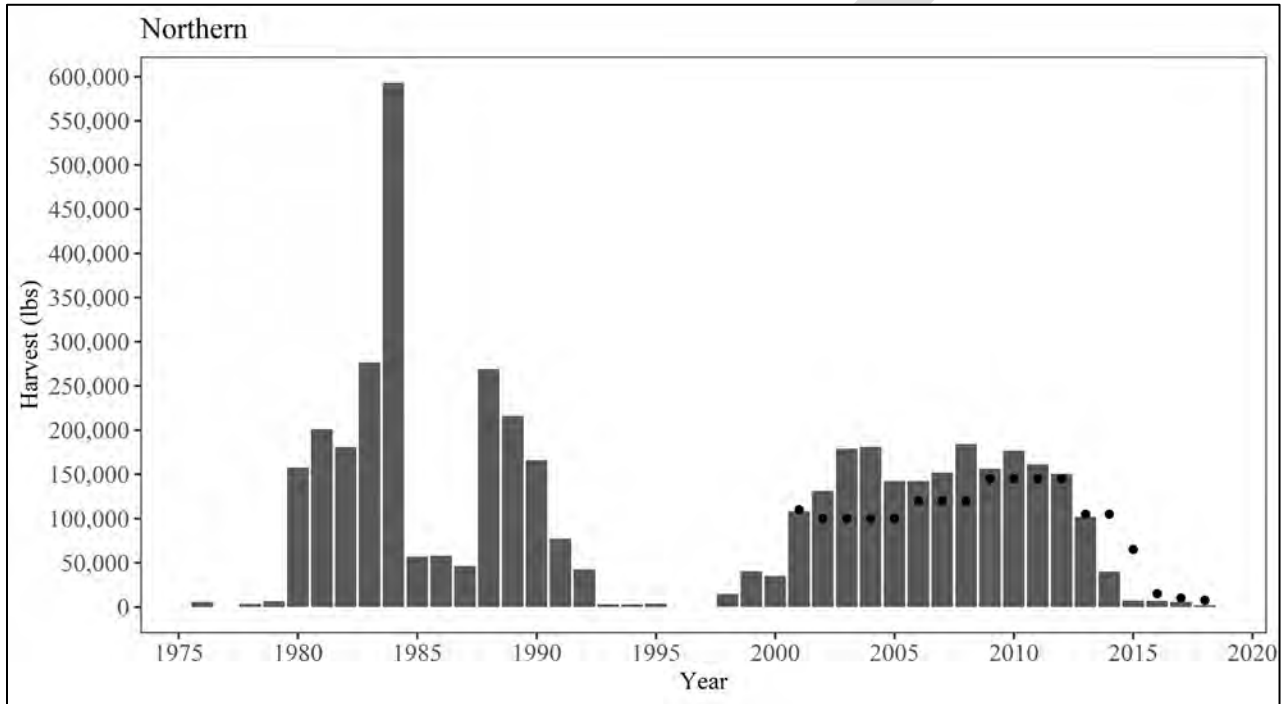


Figure 1.—Commercial GKC fishery harvest from the Northern management area. Dots represent the GH in a given year (2001–present).

Reference Points

Table 2.—Golden king crab logbook catch per unit of effort (CPUE) reference points.

Indicators	Reference Point	Description
Target Reference Point	2.7 crab/pot	Average Commercial Logbook CPUE from 2000–2017
Trigger Reference Point	2.0 crab/pot	75% of the Target Reference Point
Limit Reference Point	1.3 crab/pot	50% of the Target Reference Point

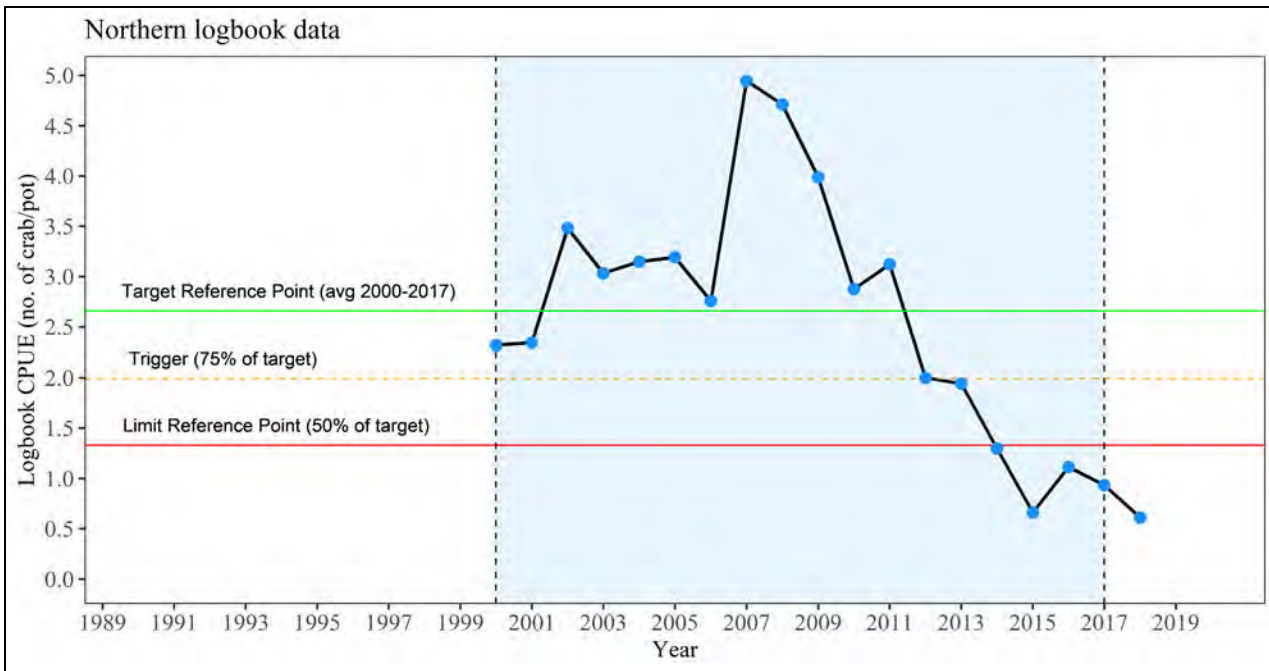


Figure 2.—Northern golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

ICY STRAIT

Season Overview

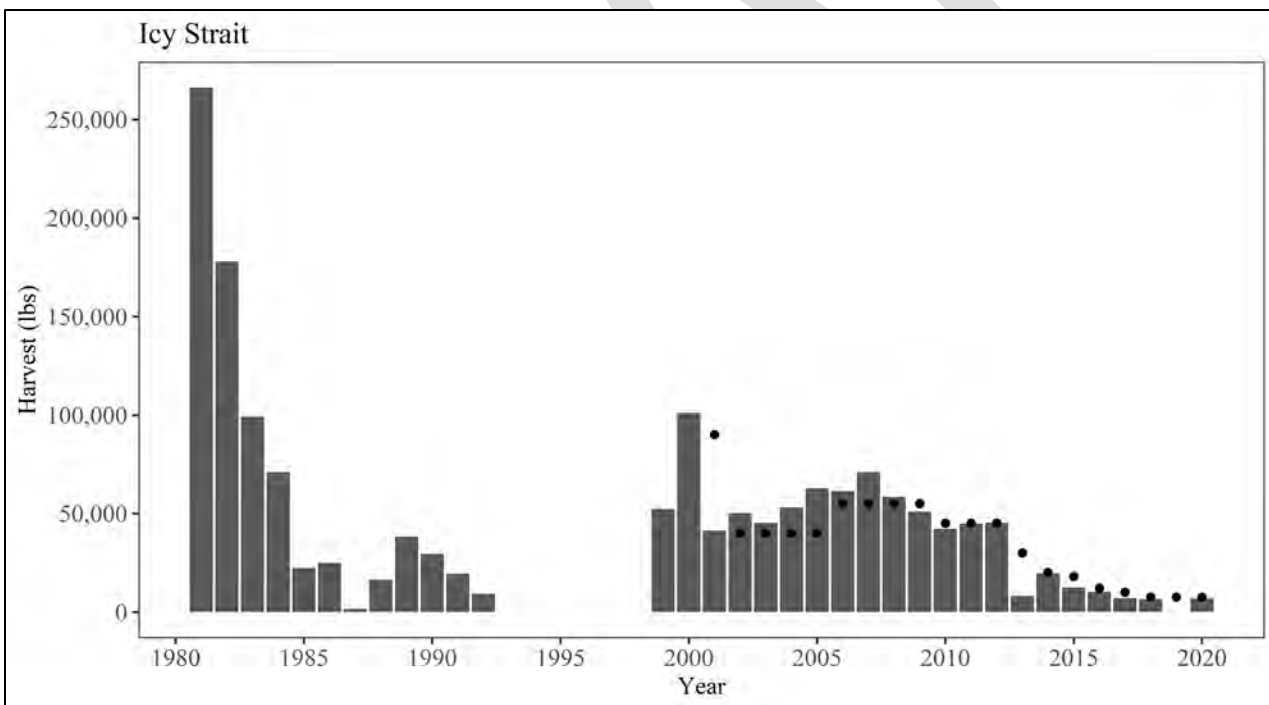


Figure 3.—Commercial GKC fishery harvest from the Icy Strait management area. Dots represent the GHL in a given year (2001–Present).

Reference Points

Table 3.– Golden king crab logbook catch per unit of effort (CPUE) reference points.

Indicators	Reference Point	Description
Target Reference Point	2.2 crab/pot	Average Commercial Logbook CPUE from 2000–2017
Trigger Reference Point	1.6 crab/pot	75% of the Target Reference Point
Limit Reference Point	1.1 crab/pot	50% of the Target Reference Point

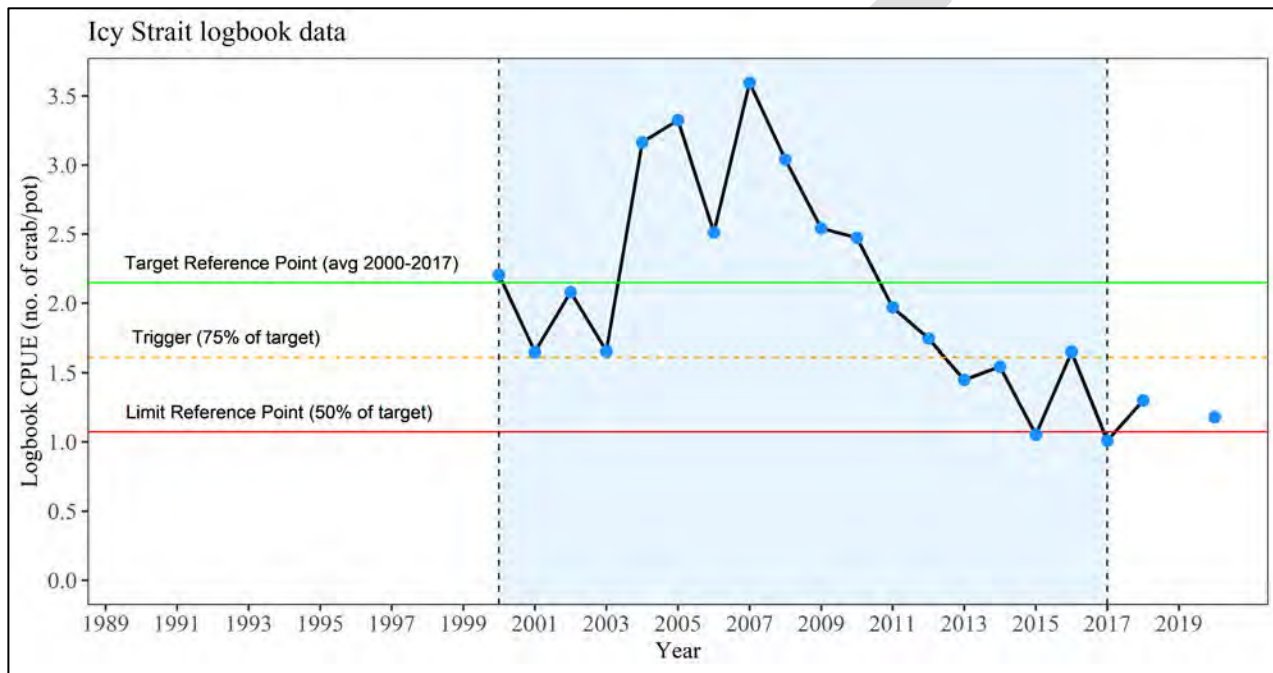


Figure 4.–Icy Strait golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

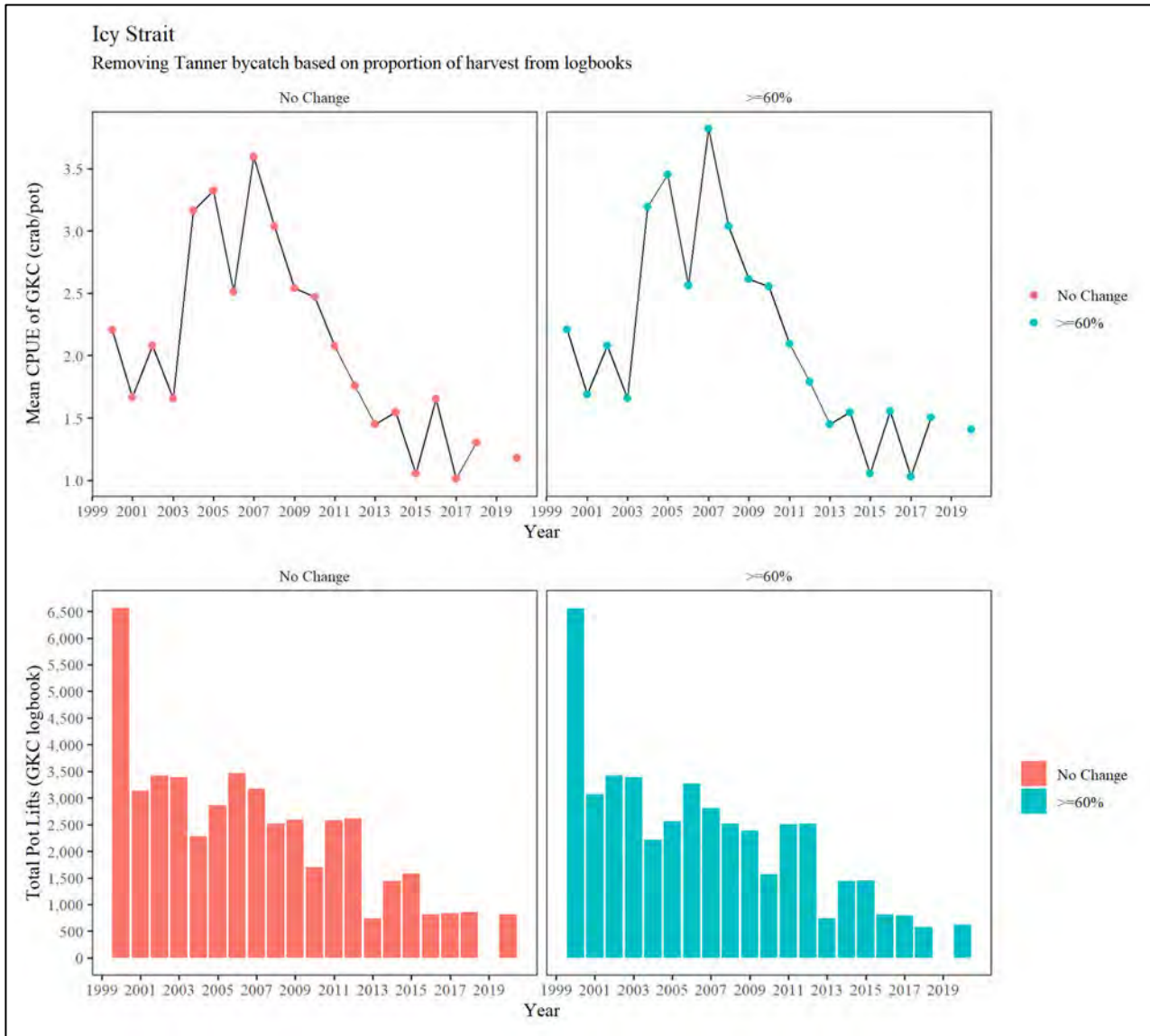


Figure 5.—Icy Strait golden king crab logbook CPUE and pot lift proportions based on reduction of Tanner crab harvest influence.

NORTH STEPHENS PASSAGE

Season Overview

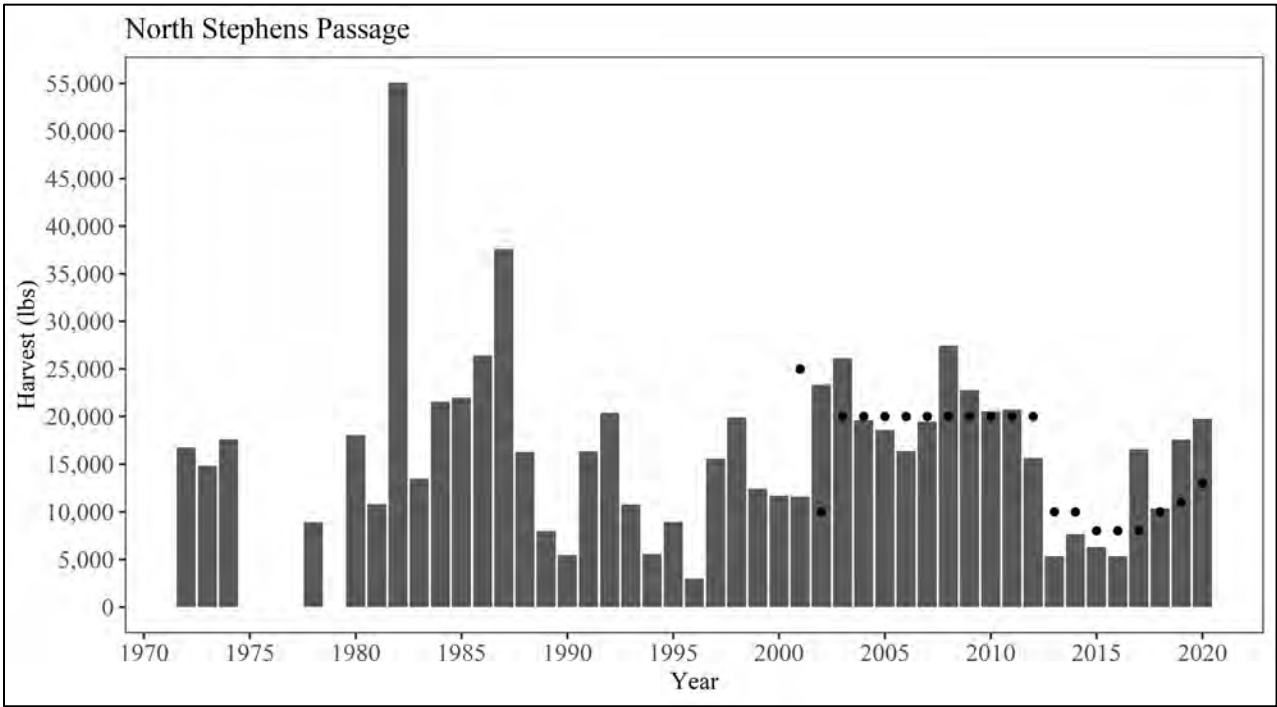


Figure 6.—Commercial GKC fishery harvest from the North Stephens Passage management area. Dots represent the GHF in a given year (2001–Present).

Reference Points

Table 4.—Golden king crab logbook catch per unit of effort (CPUE) reference points.		
Indicators	Reference Point	Description
Target Reference Point	1.6 crab/pot	Average Commercial Logbook CPUE from 2001–2017 (excluding 2000)
Trigger Reference Point	1.2 crab/pot	75% of the Target Reference Point
Limit Reference Point	0.8 crab/pot	50% of the Target Reference Point

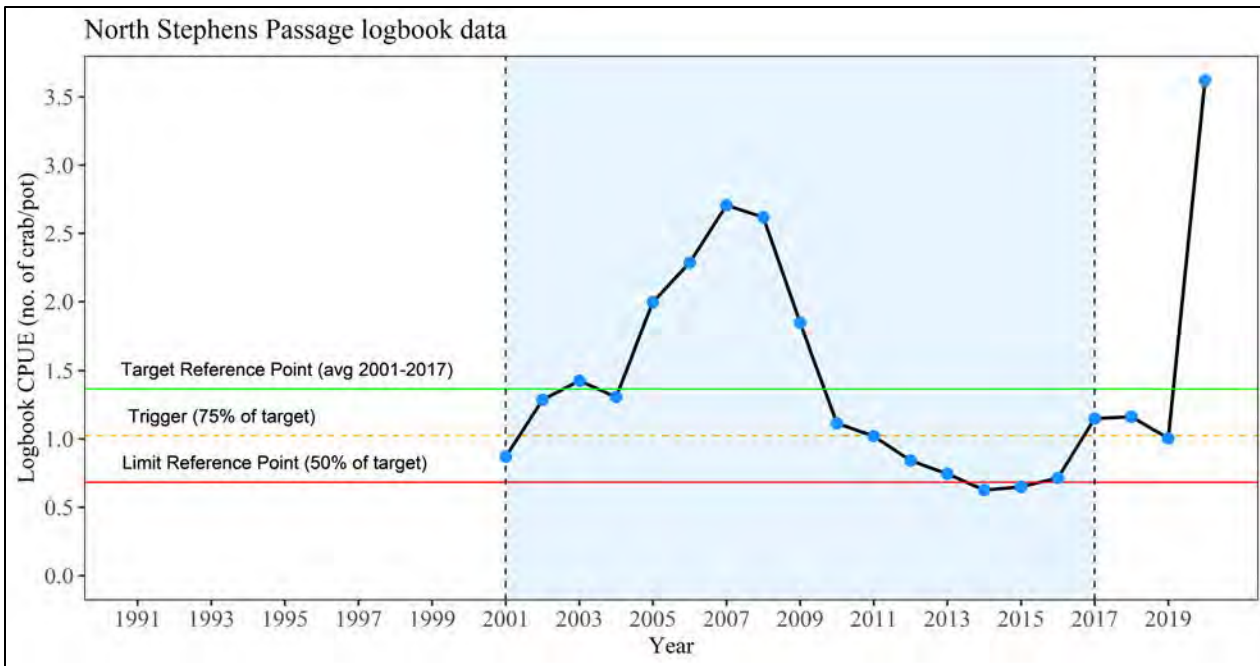


Figure 7.—North Stephens Passage golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

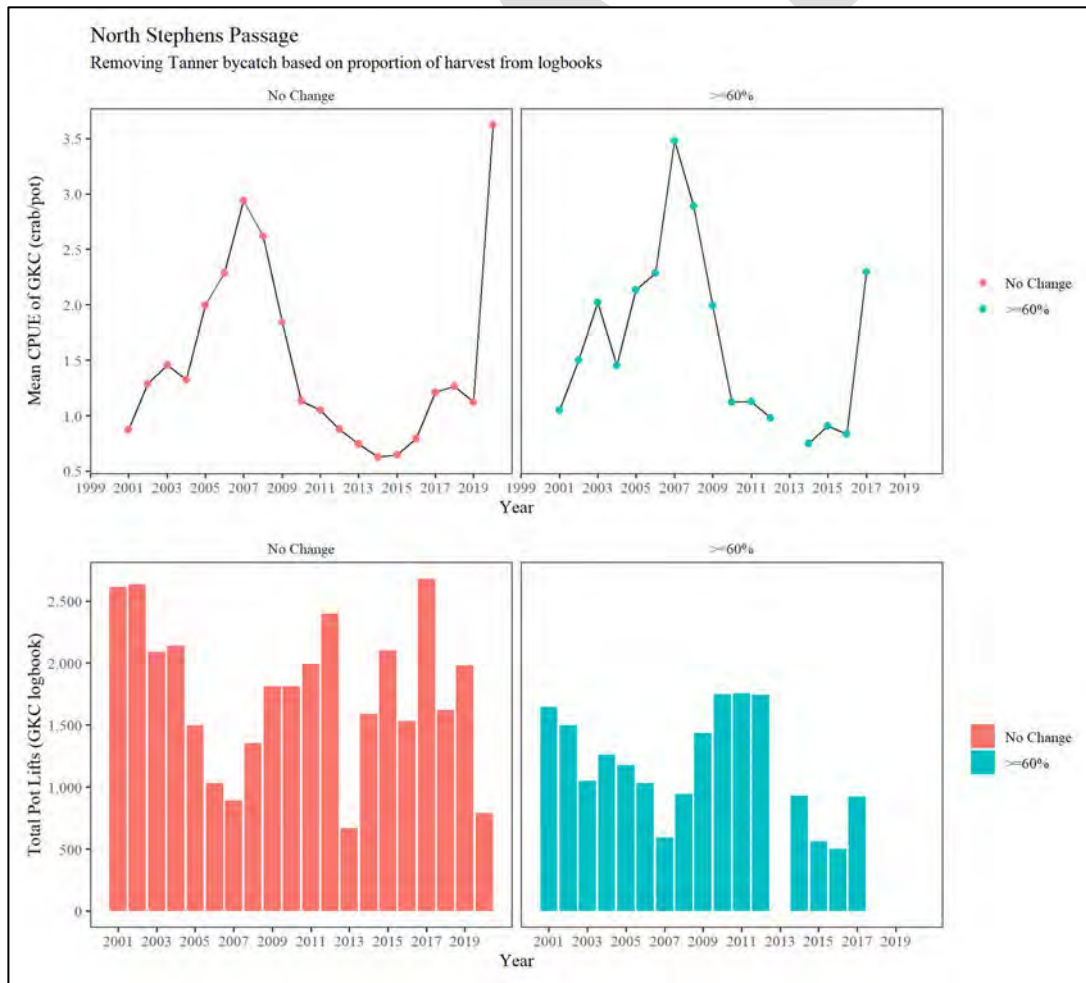


Figure 8.—North Stephens Passage golden king crab logbook CPUE and pot lift proportions based on reduction of Tanner crab harvest influence.

Information from Annual Tanner Crab Stock Assessment Survey

The Department conducts an annual stock assessment survey in Holkham Bay where GKC have been caught incidentally. Data presented here includes spatial distribution and quantity of catch and by sex and recruit status.

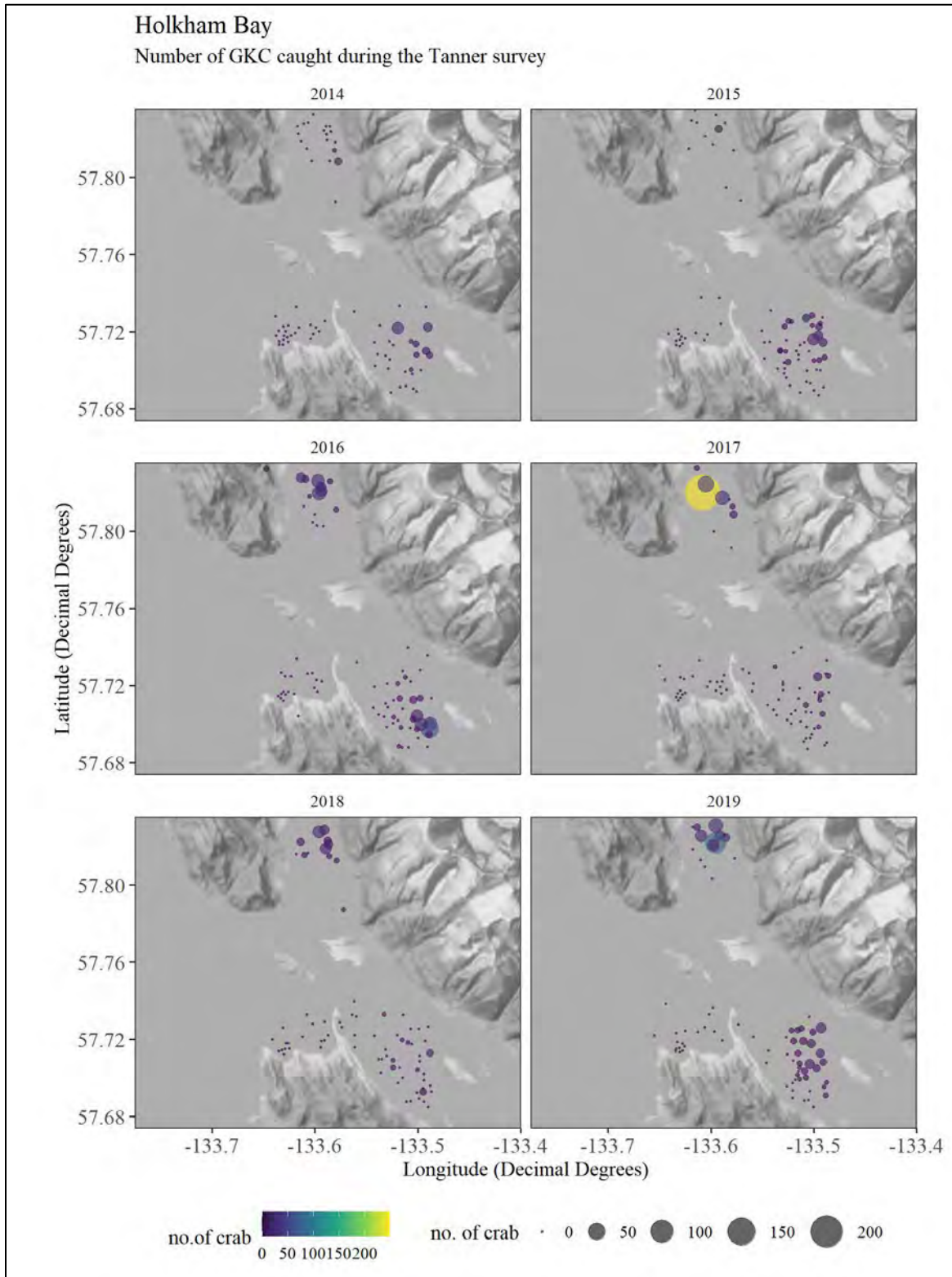


Figure 9.—Number of golden king crab caught during the annual Tanner crab stock assessment survey in Holkham Bay (2014–2019).

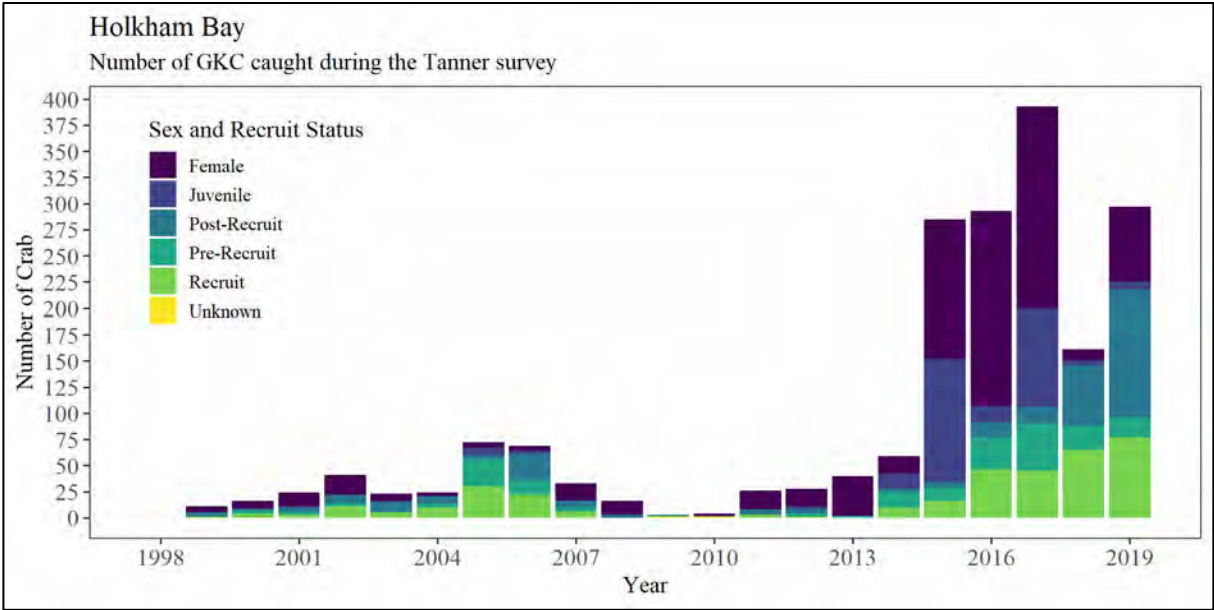


Figure 10.—Number of golden king crab caught during the annual Tanner crab stock assessment survey in Holkham Bay by sex and recruit status (1999-2019).

EAST CENTRAL

Season Overview

The East Central management area was closed for the 2018 and 2020 seasons.

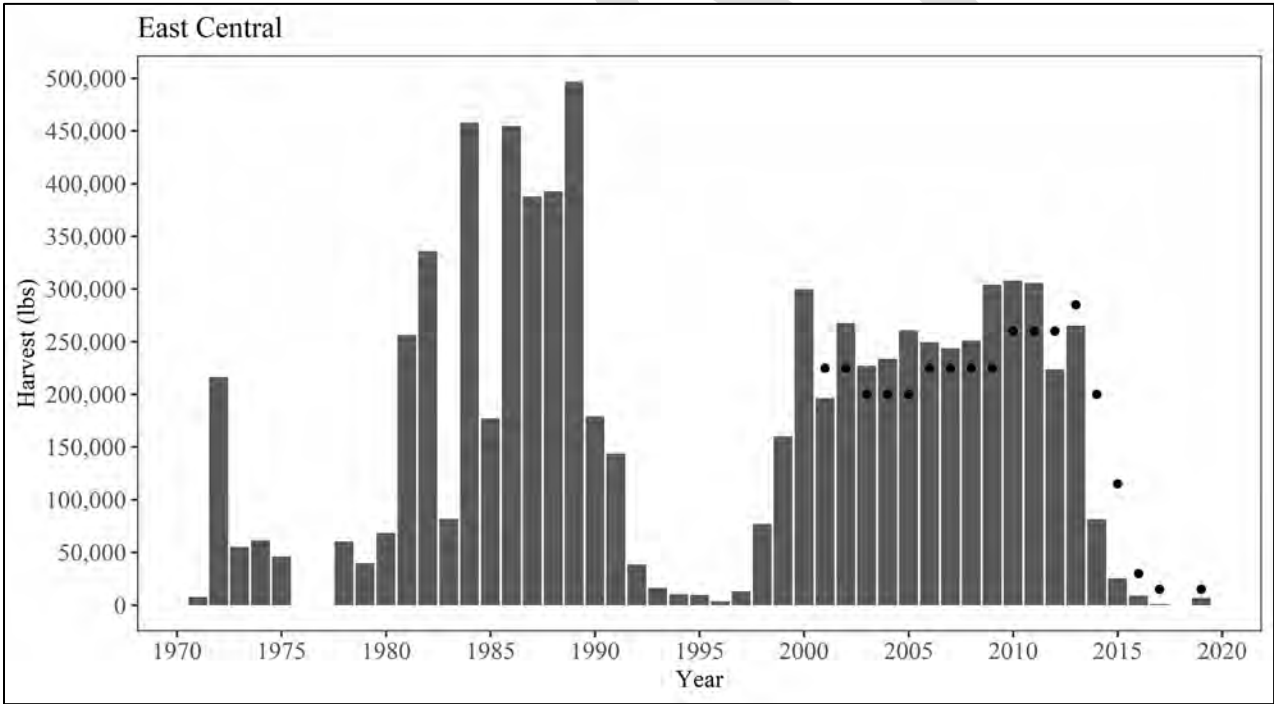


Figure 11.—Commercial GKC fishery harvest from the East Central management area. Dots represent the GHY in a given year (2001–Present).

Reference Points

Table 5.—Golden king crab logbook catch per unit of effort (CPUE) reference points.

Indicators	Reference Point	Description
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Target Reference Point	3.4 crab/pot	Average Commercial Logbook CPUE from 2000–2017
Trigger Reference Point	2.5 crab/pot	75% of the Target Reference Point
Limit Reference Point	1.7 crab/pot	50% of the Target Reference Point

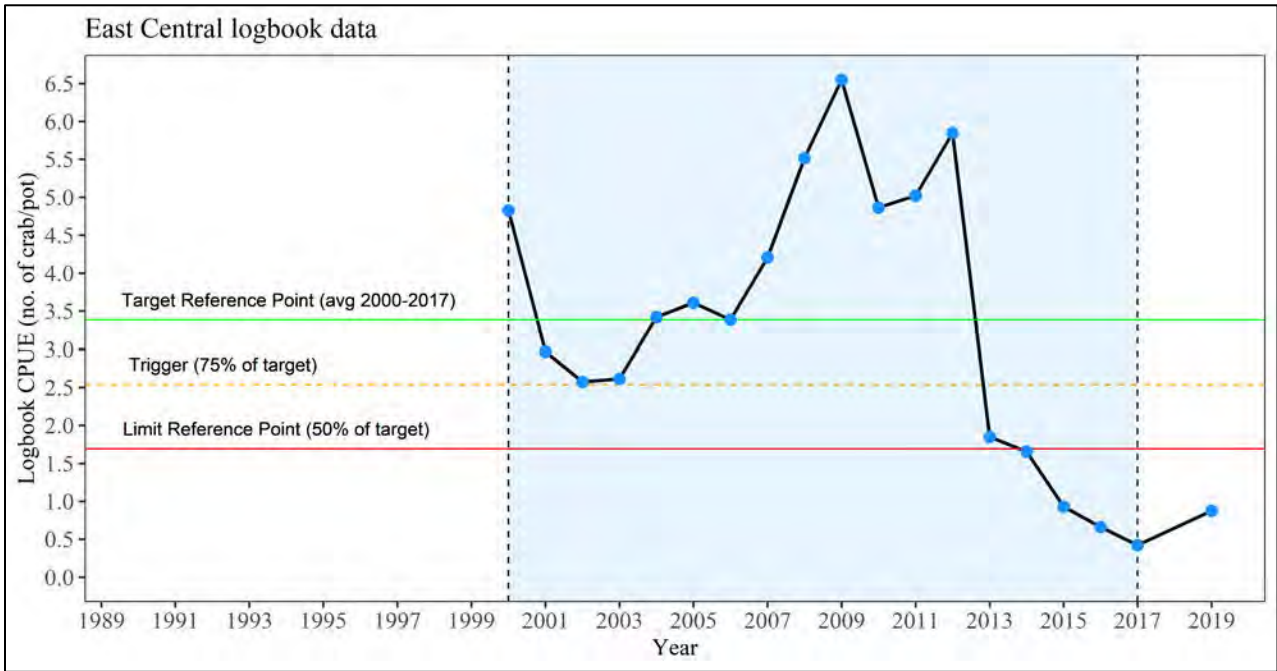


Figure 12.—East Central golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

MID-CHATHAM STRAIT

Season Overview

The Mid-Chatham Strait management area was closed for the 2020 season.

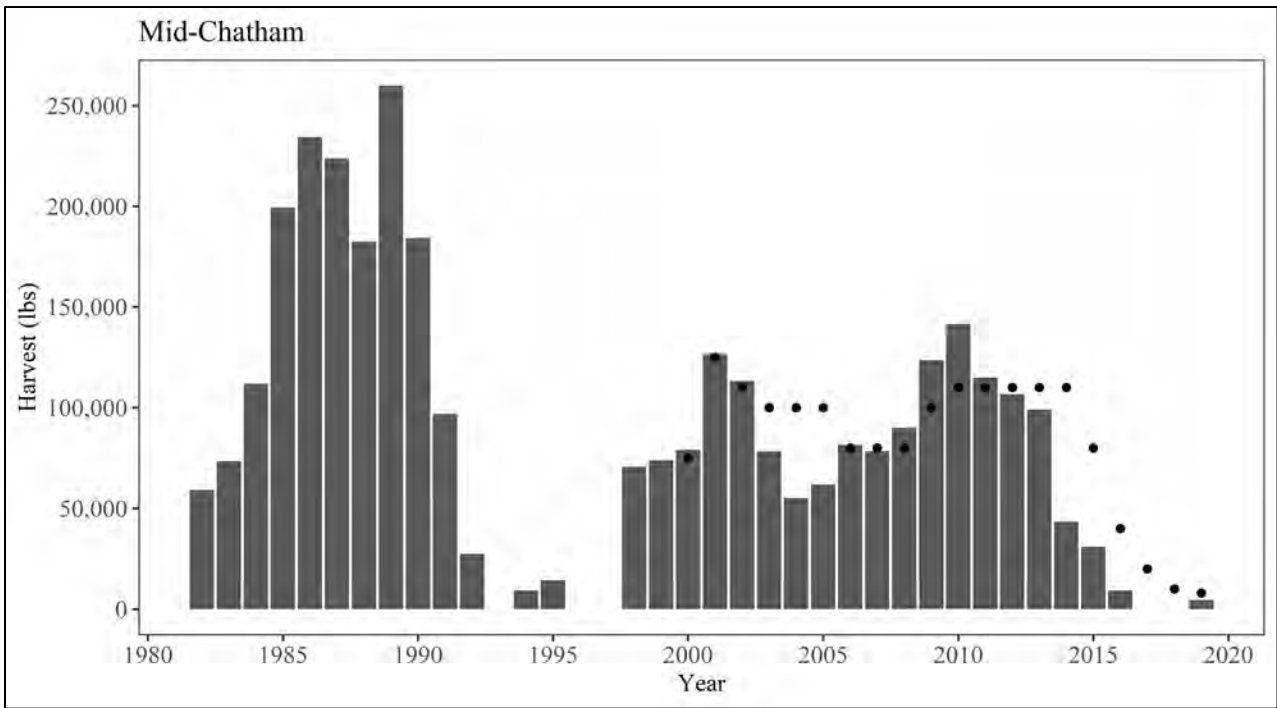


Figure 13.—Commercial GKC fishery harvest from the Mid-Chatham Strait management area. Dots represent the GHL in a given year (2001–Present).

Reference Points

Table 6.—Golden king crab logbook catch per unit of effort (CPUE) reference points.

Indicators	Reference Point	Description
Target Reference Point	3.4 crab/pot	Average Commercial Logbook CPUE from 2000–2017
Trigger Reference Point	2.5 crab/pot	75% of the Target Reference Point
Limit Reference Point	1.7 crab/pot	50% of the Target Reference Point

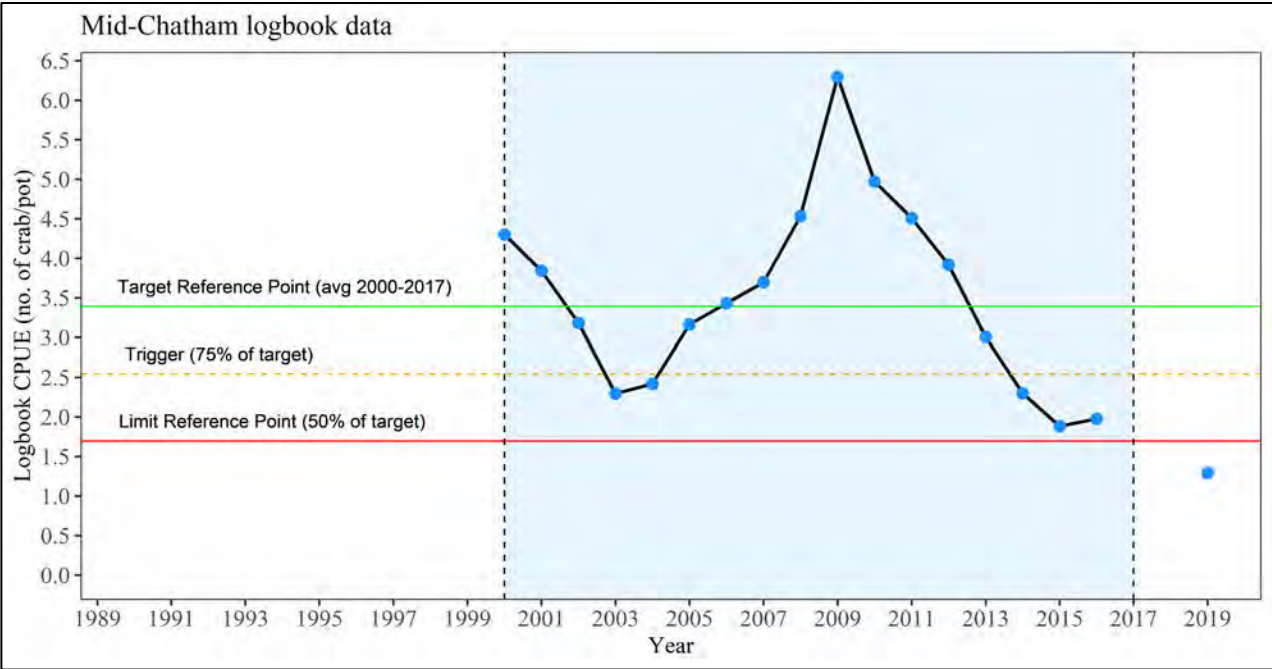


Figure 14.—Mid-Chatham Strait golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

LOWER CHATHAM STRAIT

Season Overview

The Lower Chatham Strait management area was closed for the 2020 season.

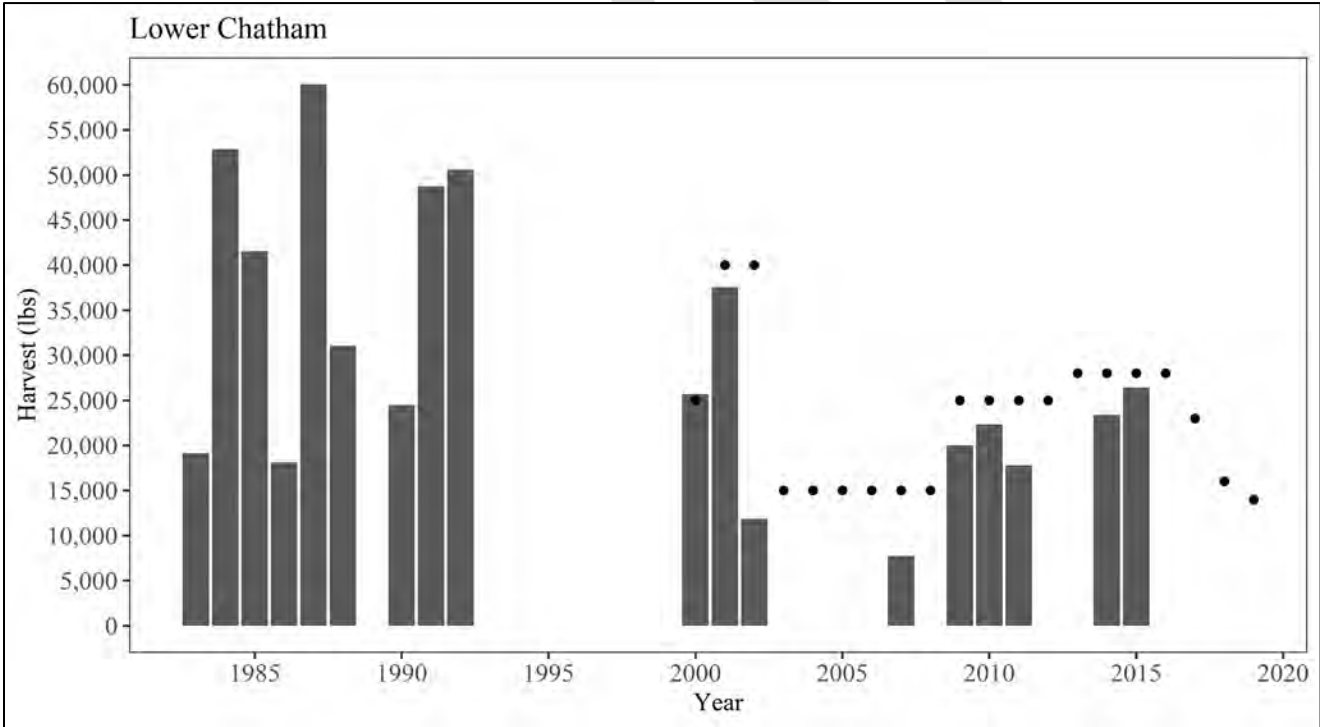


Figure 15.—Commercial GKC fishery harvest from the Lower Chatham Strait management area. Dots represent the GHL in a given year (2001–Present).

Reference Points

Table 7.—Golden King Crab logbook catch per unit of effort (CPUE) reference points.

Indicators	Reference Point	Description
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Target Reference Point	3.1 crab/pot	Average Commercial Logbook CPUE from 2000–2017 (excluding 2013)
Trigger Reference Point	2.3 crab/pot	75% of the Target Reference Point
Limit Reference Point	1.6 crab/pot	50% of the Target Reference Point

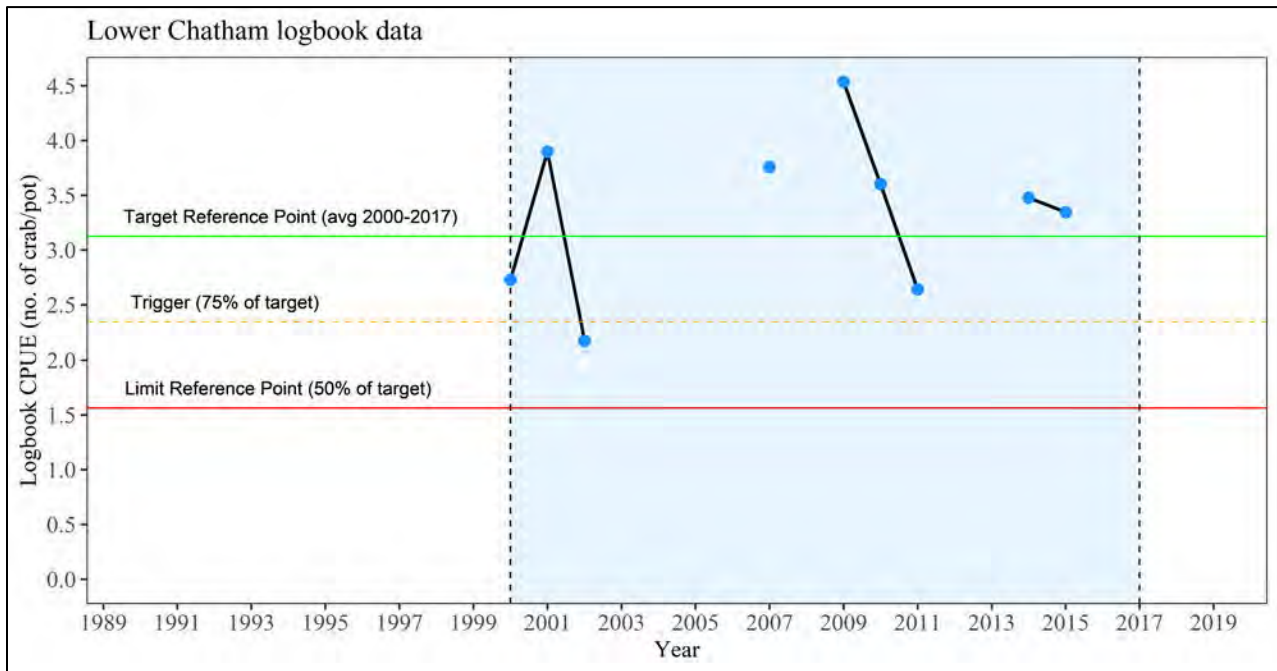


Figure 16.—Lower Chatham Strait golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

SOUTHERN

Season Overview

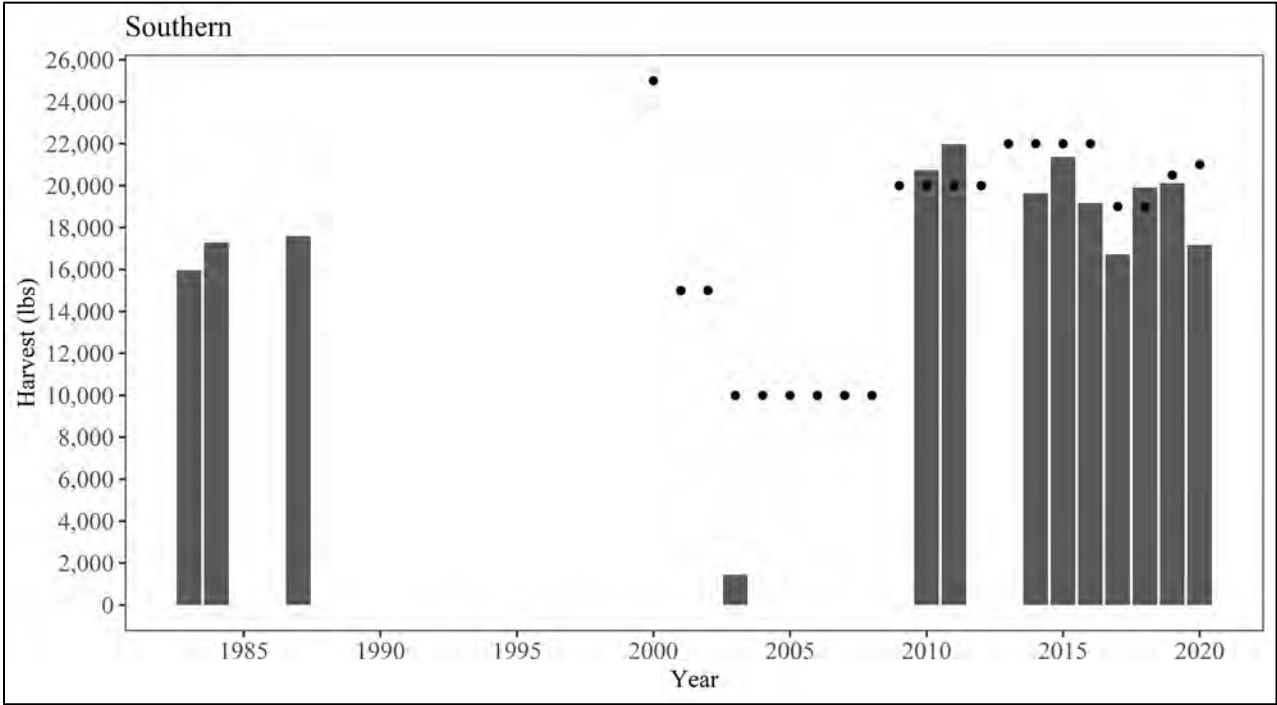


Figure 17.—Commercial GKC fishery harvest from the Southern management area. Dots represent the GHL in a given year (2001–Present).

Reference Points

Table 8.—Golden king crab logbook catch per unit of effort (CPUE) reference points.

Indicators	Reference Point	Description
Target Reference Point	4.1 crab/pot	Average Commercial Logbook CPUE from 2000-2017
Trigger Reference Point	3.1 crab/pot	75% of the Target Reference Point
Limit Reference Point	2.0 crab/pot	50% of the Target Reference Point

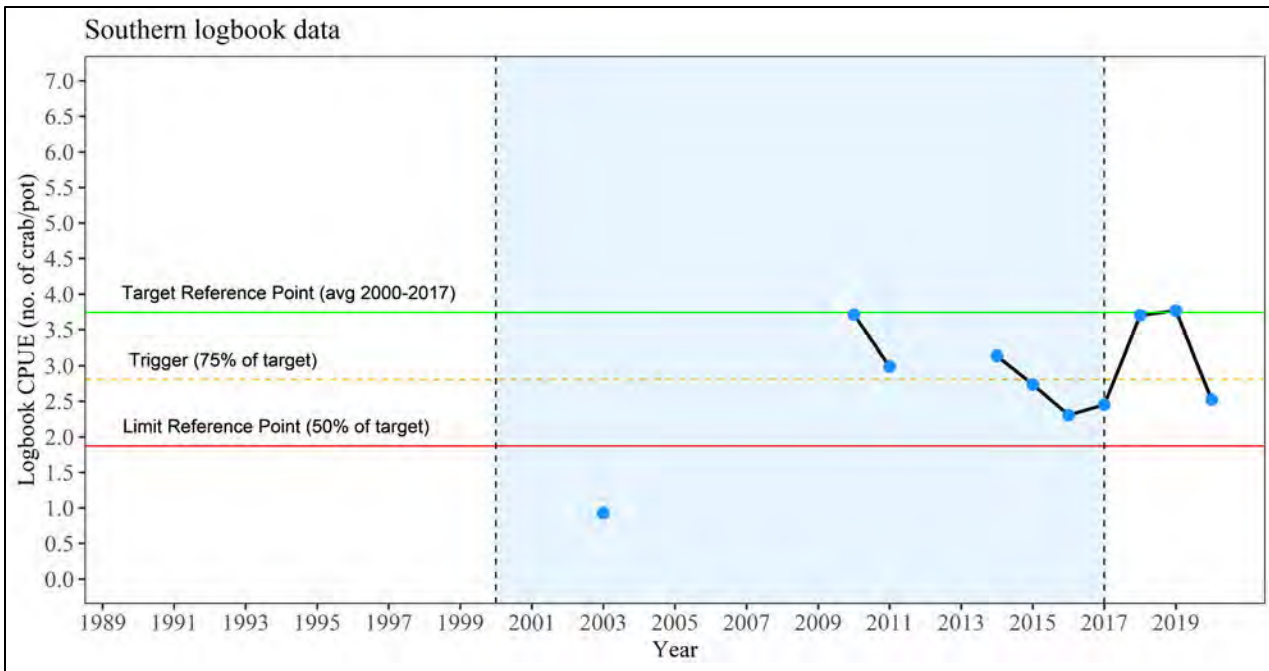


Figure 18.—Southern golden king crab reference points (Target, Trigger, and Limit) and fishery performance utilizing logbook CPUE.

Appendix for Proposal 39 - SUPPORT





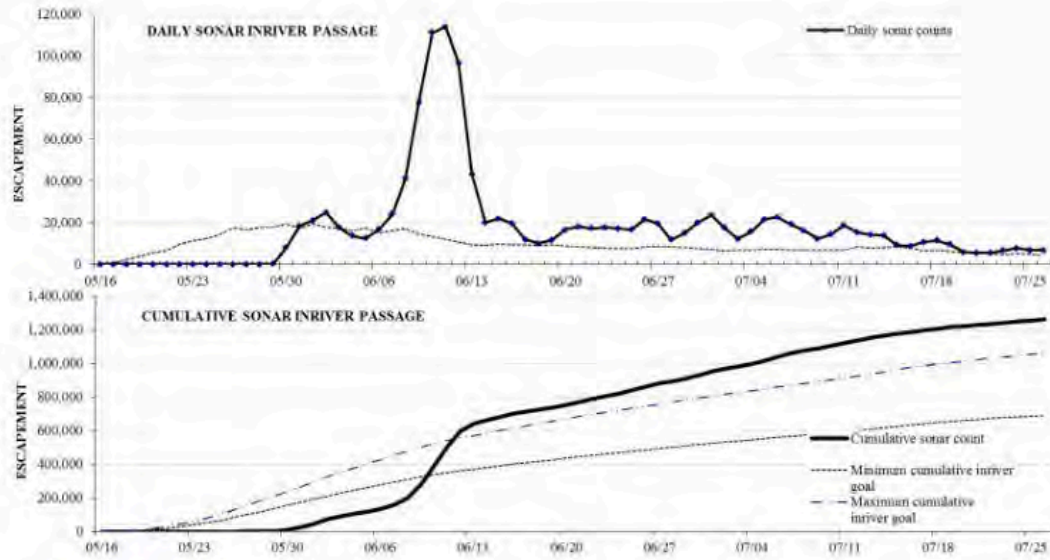
King crab caught during commissioner's permit tanner fishery



King Crab caught during 2020 king crab test fishery

Appendix for Proposals 51, 52, 53 - OPPOSE

64



Appendix A8--Minimum and maximum inriver sonar goal versus actual daily and cumulative salmon passage, Miles Lake sonar, 2013.

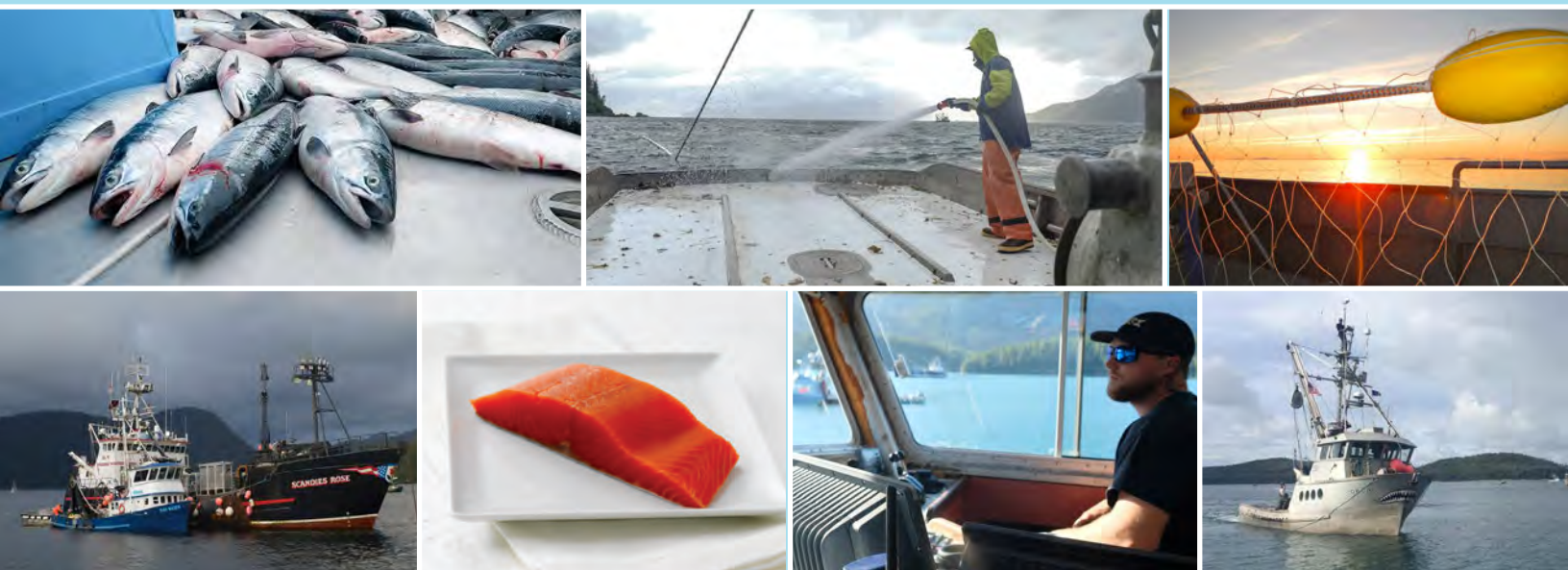
Appendix for Proposal 78 - OPPOSE

Economic Impact of the

Prince William Sound Aquaculture Corporation

September 2018

Prepared for
**Prince William Sound
Aquaculture Corporation**



Prepared by
**McDowell
GROUP**

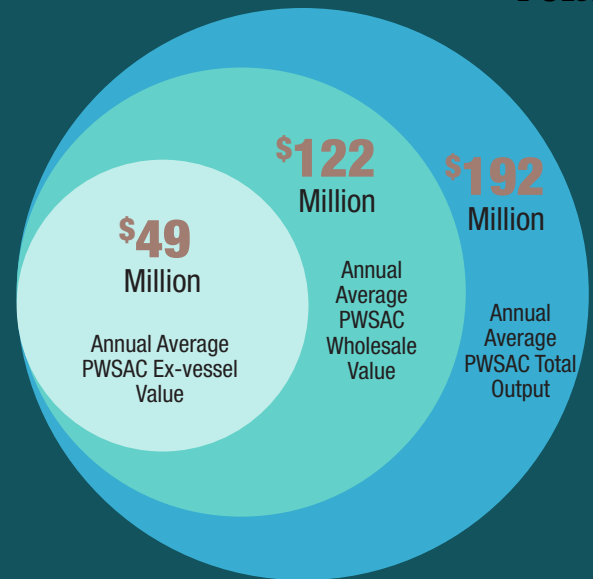




By the Numbers

Prince William Sound Aquaculture Corporation

2012-2017



539 million pounds

90 million pounds

\$296 million

\$49 million

\$59 million

43%

\$730 million

\$122 million

1,405 jobs
direct, indirect, and induced

\$68 million
including all multiplier effects

\$192 million

Cumulative common property harvest volume of PWSAC salmon

Annual average volume of PWSAC salmon common property harvest

Cumulative common property harvest value of PWSAC salmon

Annual average value of PWSAC salmon common property harvest

Annual average odd-year value of PWSAC common property harvest

PWSAC salmon share of total PWS commercial salmon harvest value, 2012-2017

Cumulative first wholesale value of PWSAC-produced salmon products

Annual average first wholesale value of PWS-produced salmon products

Annual average employment supported by PWSAC

Total annual labor income supported by PWSAC

Total annual economic output generated by PWSAC produced salmon



Introduction

This report details the broad economic impact on Alaska of Prince William Sound Aquaculture Corporation (PWSAC). This is the sixth impact report prepared by McDowell Group for PWSAC since 2001.

PWSAC was founded in 1974 by local Prince William Sound (PWS) fishermen. The private non-profit corporation's mission is to optimize salmon production in PWS for all user groups, including commercial, sport, personal use, and subsistence. PWSAC produces all five salmon species from five hatcheries, four located in PWS and one located inland on the Gulkana River. PWSAC manages and operates three facilities owned by the Alaska Department of Fish & Game at no cost to the state.

Armin F. Koernig Hatchery

Originally the site of a salmon cannery, the Armin F. Koernig Hatchery is located about 90 miles west of Cordova on Evans Island. The facility was PWSAC's first hatchery and began operations in 1974.

Wally Noerenberg Hatchery

The Wally Noerenberg Hatchery is located approximately 20 miles east of Whittier in Lake Bay. Built in 1985, the hatchery is one of the largest salmon production facilities in North America.

Cannery Creek Hatchery

The Cannery Creek Hatchery was built in 1978 by the Alaska Department of Fish and Game (ADF&G). In 1988 PWSAC took over management and operations (ADF&G still owns the hatchery.) The facility is located about 40 miles east of Whittier in Unakwik Inlet.

Main Bay Hatchery

Built in 1981 by ADF&G and still owned by the state, PWSAC began providing management and operation services in 1991. Main Bay Hatchery is located 40 miles southwest of Whittier.

Gulkana Hatchery

The Gulkana Hatchery is located on the Gulkana River near Paxson, 250 miles northeast of Anchorage. Established by ADF&G in 1973, PWSAC manages the facility which focuses primarily on sockeye salmon.

Administrative Operations

PWSAC's main administrative offices are in Cordova. The organization also operates a distribution center in Anchorage used to consolidate and expedite supplies to hatcheries. That center also houses administrative staff.

Commercial Fisheries Impact

Prince William Sound commercial seine and gillnet fishermen harvest significant volumes of salmon produced by PWSAC.

Common-property Commercial Harvest and Ex-vessel value

- ▶ Between 2012 and 2017, PWS commercial fishermen (all gear types) harvested a cumulative total of 539 million pounds of PWSAC-produced salmon worth \$296 million. The annual commercial harvest of PWSAC fish averaged 90 million pounds worth \$49 million.
- ▶ PWSAC salmon accounted for 43 percent of the total PWS salmon harvest volume over the 2012 to 2017 period (1.2 billion pounds) and 45 percent of the total value (\$642 million).
- ▶ By volume and value, pink salmon is the most important species produced by PWSAC. Commercial fishermen harvested 390 million pounds (120 million pink salmon) from PWSAC between 2012 and 2017 worth about \$131 million. The annual commercial harvest of PWSAC pink salmon averaged 65 million pounds worth \$22 million.
- ▶ Over the 2012–2017 period, more than one in three pink salmon harvested in PWS came from PWSAC.
- ▶ Sockeye salmon are the most valuable species produced by PWSAC on a per pound basis. Over the study period, 44 million pounds were harvested worth \$94 million. About 7.3 million pounds of sockeye worth \$16 million were harvested annually.
- ▶ Chum are valued primarily for their roe, but flesh markets have developed in recent years. About 104 million pounds of this PWSAC-sourced chum worth \$68 million were harvested between 2012 and 2017, or an annual average of 17 million pounds worth \$11 million.
- ▶ PWSAC also produces coho: about 2.2 million pounds worth \$2.3 million were harvested over the study period. Nearly 375,000 pounds were harvested annually worth about \$390,000.



Seine Harvest of PWSAC Salmon

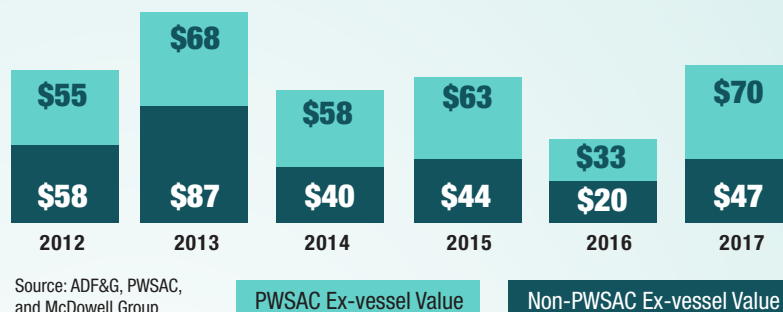
- ▶ Seine vessels focus primarily on pink and chum salmon fisheries in PWS. About 220 vessels with 900 crew and captains harvest PWSAC fish.
- ▶ Between 2012 and 2017, seiners harvested about 996 million pounds of salmon in PWS worth \$347 million. PWSAC fish accounted for 404 million pounds or 41 percent of total volume. These hatchery fish were valued at \$148 million, 43 percent of the total seine harvest.
- ▶ For the individual PWS seine permit holder, earnings over this period totaled \$1.6 million, or an annual average of \$265,000. Harvest of PWSAC fish contributed about \$682,000 (annual average of \$114,000) to this total.

Ex-vessel Earnings from PWSAC Salmon 2012-2017 (millions of dollars)

Year	Seine	Gillnet	Total
2012	\$23	\$35	\$58
2013	\$58	\$29	\$87
2014	\$14	\$25	\$40
2015	\$25	\$19	\$44
2016	\$2	\$18	\$20
2017	\$25	\$22	\$47
Total	\$148	\$148	\$296

Source: ADF&G, PWSAC, and McDowell Group Estimates.

Value of Prince William Sound Common-Property Salmon Harvest by Source, 2012-2017 (millions of dollars)



Gillnet (Drift and Setnet) Harvest of PWSAC Salmon

- ▶ Gillnetters harvest less volume than seiners but capture higher value sockeye and coho. Nearly 520 drift vessels with about a thousand crew and captains harvest fish in PWS, in addition to roughly 30 setnet sites with 90 crew and permit holders.
- ▶ PWS gillnet fishermen harvested 220 million pounds of salmon between 2012 and 2017, an annual average of 37 million pounds. This harvest was worth \$295 million, an annual average of \$49 million per year. Of this total, salmon from PWSAC contributed 135 million pounds worth \$148 million, or 61 percent of total volume and 50 percent of earnings.
- ▶ For the average permit holder, earnings over this 6-year period totaled \$538,000. Harvest of PWSAC fish accounted for \$270,000 of this amount, or about \$45,000 annually.

Processing Impact

- ▶ Salmon from PWSAC is processed primarily in Cordova and Valdez, in addition to Seward, Kodiak, and other communities.
- ▶ The PWS seafood processing sector includes shoreside plants, floating processors, and direct marketers.
- ▶ Between 2012 and 2017, PWS processors sold \$1.63 billion worth of seafood products; \$1.58 billion (97 percent) came from salmon. Halibut, sablefish, Pacific cod, and other species composed the remainder.
- ▶ Between 2012 and 2017, the first wholesale value of salmon products originating from PWSAC salmon totaled more than \$730 million, or an annual average of about \$122 million. Pink salmon products were the largest component, contributing an annual average of more than \$70 million.
- ▶ Processors added \$434 million in value to PWSAC-produced salmon over the 2012-2017 period. This value-added (or gross margin) is total value (\$730 million) minus the cost of purchasing the fish (\$296 million).
- ▶ Most PWSAC pink salmon is processed into frozen headed and gutted (H&G) form and shipped to a reprocessing facility. A declining portion of pink salmon are canned. In 2012 about half of all Alaska pink salmon were canned; in 2017 this proportion had declined to about a quarter.
- ▶ Nearly all PWSAC chum leave Alaska as frozen H&G. The primary coho and sockeye products are also primarily frozen, but with more value-add such as fillets and vacuum sealed. These two species also serve the fresh market, especially sockeye in the early season.
- ▶ Utilization of PWS salmon has increased as markets have been developed for different grades of salmon flesh products. Increased regional capacity for fish meal and fish oil production has also increased utilization.

Sport, Personal Use, and Subsistence Impact

Sport

- ▶ PWSAC salmon are commonly harvested by charter boat operators from Seward.
- ▶ Nearly 40,000 PWSAC coho were harvested by anglers over the 2012-2017 period, equal to about 2,200 daily bag limits annually; 7,500 PWSAC sockeye were harvested as well, or more than 200 daily bag limits per year.
- ▶ Residents of more than 50 Alaska communities harvested more than 325,000 PWSAC-produced sockeye salmon from 2012 through 2017, including:
 - Fairbanks: **115,000 fish**
 - Anchorage: **80,000 fish**
 - Matanuska-Susitna: **60,000 fish**
 - Copper River Valley: **50,000 fish**

Personal Use and Subsistence

- ▶ Personal use and subsistence users harvest sockeye salmon produced by PWSAC's Gulkana hatchery in the Copper River. Between 2008 and 2017, PWSAC was the source of nearly two-in-five sockeye salmon harvested in these fisheries.
- ▶ Assuming the average 4-person family eats 40 salmon per year, PWSAC's annual contribution to personal use and subsistence fisheries helps feed 5,400 Alaskans annually.
- ▶ Harvest of PWSAC salmon attracts users who support hospitality, retail, and guiding businesses in the Copper River Valley.

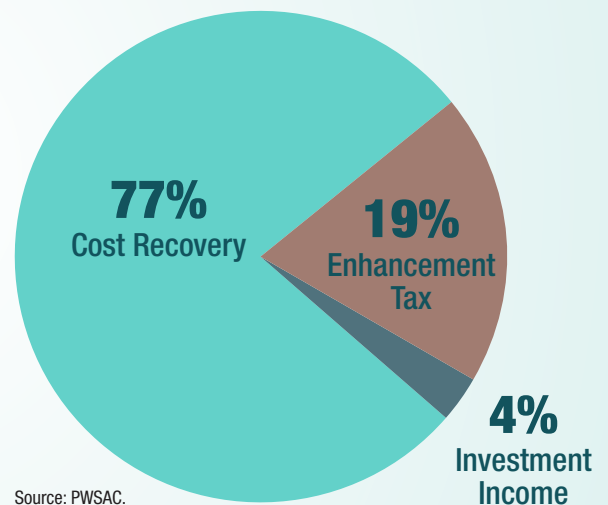


PWSAC Operations

PWSAC is funded primarily through revenue generated from cost recovery operations when a portion of returning hatchery fish are sold directly to seafood processors. Other sources of operating revenue include a 2.0 percent enhancement tax paid by area fishermen and investment revenue. PWSAC periodically receives capital grants from the State of Alaska to support improvements at state-owned facilities.

- ▶ In 2017, operating revenue totaled \$12.6 million. Cost recovery was the largest component, contributing \$10.1 million or 80 percent of the total. Enhancement tax revenue of \$2.0 million (16 percent) and investment income of \$0.6 million (4 percent) accounted for the remainder.
- ▶ Over the 2012-2017 period, operating revenue from all sources averaged \$12.0 million. Cost recovery revenue contributed an annual average of \$9.3 million, or 77 percent of the total. Enhancement tax generated an average of \$2.3 million (19 percent) per year and investment income totaled \$0.4 million (4 percent) annually.

PWSAC Operating Revenue Sources
2012-2017 Annual Average



Source: PWSAC.



Economic Impact of PWSAC in Alaska

- ▶ PWSAC accounted for an annual average of 1,405 direct, indirect, and induced jobs over the 2012-2017 period. Total annual labor income averaged \$68 million over this time, including all multiplier effects.
- ▶ PWSAC's employment impacts include 610 annual-equivalent jobs connected with commercial fishing, 645 jobs associated salmon processing, and 150 jobs related to hatchery administration and operations.
- ▶ PWSAC's impacts include \$39 million in labor income connected with commercial fishing, \$24 million associated salmon processing, and \$6 million related to hatchery administration and operations.
- ▶ Total economic output associated with PWSAC, including all direct, indirect, and induced spending and wages, is estimated at \$192 million annually.
- ▶ The total number of people earning income as a result of PWSAC operations and production is more than double the annual average of 1,405, including fishermen, seasonal processing workers, seasonal and year-round hatchery employees, and support sector workers.

Annual Average Economic Impact of PWSAC 2012-2017

	Direct Impacts	Indirect & Induced Impacts	Total Economic Impacts
Commercial Fishing			
Employment	420	190	610
Labor Income	\$29.4 million	\$9.2 million	\$38.6 million
Seafood Processing			
Employment	425	220	645
Labor Income	\$16.8 million	\$7.0 million	\$23.8 million
PWSAC Operations			
Employment	85	65	150
Labor Income	\$3.5 million	\$2.2 million	\$5.7 million
Total Economic Impact			
Employment	930	475	1,405
Labor Income	\$49.6 million	\$18.4 million	\$68.0 million
Output	\$123.2 million	\$69.0 million	\$192.2 million

Note: Totals may not sum due to rounding.

Source: McDowell Group estimates using IMPLAN, ADF&G, DOLWD, and PWSAC data.



Distribution of Economic Impacts

The economic impact of PWSAC extends well beyond Prince William Sound. PWS seine and gillnet permit holders come from many Alaska communities:

- ▶ In 2017, PWS seine permit holders were from 22 Alaska communities; residents of 30 Alaska communities held PWS gillnet permits.
- ▶ In 2017, Anchorage and Matanuska Borough residents held 115 limited entry permits for PWS.
- ▶ After Cordova, Homer residents generate the most commercial fishing income (more than \$21.6 million in 2017) from PWS salmon fisheries. Resident of Kenai Peninsula Borough earned a total of \$31.9 million.
- ▶ Municipality of Anchorage residents rank third in terms of PWS commercial fishing income, with \$13.7 million in earnings in 2017, while Mat-Su Borough residents earned more than \$3.5 million.

With PWSAC accounting for 45 percent of the value of PWS salmon fisheries over the 2012-2017 period (including 40 percent in 2017), it is evident that income generated by harvest of PWSAC salmon is broadly distributed.

PWSAC's economic impact outside of PWS also stems from its purchases of supplies, professional services, freight services, and many other goods and services from vendors throughout Southcentral Alaska.

In 2017, PWSAC spent \$4.0 million on with 158 different vendors in 23 Alaska communities, including \$1.5 million in Anchorage with 102 different vendors. Other spending occurred in Whittier, Seward, Fairbanks, Palmer, Eagle River, and Kenai, among others.

PWSAC has more direct economic impact in the Anchorage/Mat-Su area as well, employing 16 individuals from the region with annual wages of nearly \$600,000. PWSAC maintains an office in Anchorage, with 7 employees.

Local processors handling PWSAC salmon supported further economic impacts in Southcentral Alaska outside PWS through purchases of supplies, utilities, and other services.

Residency of PWS Salmon Permit Holders with Ex-vessel Earnings, 2017

Location	Permits Owned	Ex-vessel Earnings
Valdez/Cordova Census Area	325	\$36,865,213
Cordova	301	\$33,093,490
Valdez	21	n/a
Chitina	1	n/a
Copper Center	1	n/a
Whittier	1	n/a
Kenai Peninsula Borough	155	\$31,853,416
Homer	97	\$21,627,598
Seward	22	\$4,238,507
Soldotna	6	\$282,171
Kasilof	7	\$269,402
Kenai	7	n/a
Anchor Point	5	n/a
Sterling	5	n/a
Moose Pass	3	n/a
Ninilchik	1	n/a
Nikolaevsk	1	n/a
Seldovia	1	n/a
Municipality of Anchorage	81	\$13,735,376
Anchorage	48	\$4,352,712
Girdwood	22	\$6,224,356
Eagle River	8	n/a
Chugiak	3	n/a
Mat-Su Borough	34	\$3,546,537
Wasilla	26	\$2,117,088
Palmer	3	n/a
Willow	3	n/a
Sutton	2	n/a
All Other Alaska	27	\$2,606,806*
Juneau	6	n/a
Kodiak	5	\$1,964,499
Delta Junction	5	\$642,307
Fairbanks	3	n/a
Petersburg	3	n/a
Dillingham	2	n/a
Dutch Harbor	1	n/a
Haines	1	n/a
Hoonah	1	n/a
Alaska Resident Total	622	\$90,580,317

*Subtotal does not include confidential values.

Note: n/a means values are confidential. **Alaska Resident Total** includes confidential data.
Source: CFEC

Tax Revenue Associated With PWSAC

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.
- ▶ Other tax revenue is directly generated when PWSAC-sourced fish are landed in a community with a raw fish tax (e.g., Kodiak). Communities with sales tax (e.g., Cordova and Seward) are also supported indirectly when the harvest and processing sector purchase goods and services locally.
- ▶ Property tax revenue is also generated indirectly through processing of salmon. Silver Bay Seafoods and Peter Pan Seafood are among the largest non-oil property tax payers in Valdez. Trident Seafoods, Ocean Beauty Seafoods, and Copper River Seafoods paid nearly \$250,000 in 2018 property taxes to the City of Cordova.

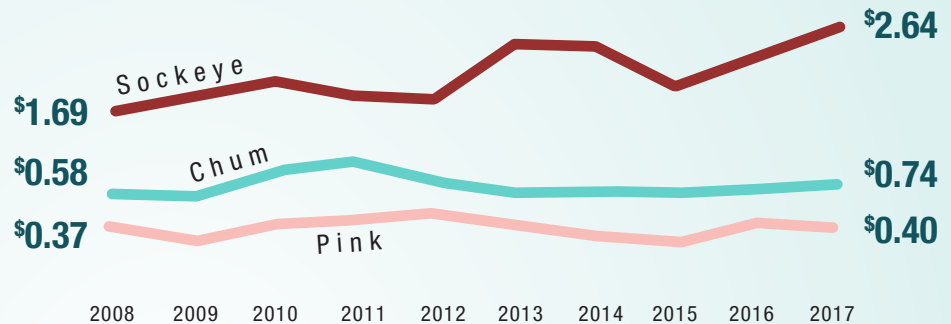




Market Outlook for Wild Alaska Salmon

- ▶ The near-term market outlook for wild Alaska salmon is positive. Strong consumer demand for Alaska-caught fish combined with processor innovations and a focus on quality have strengthened Alaska's place in the competitive global market.
- ▶ Over the last decade ex-vessel prices have generally been stable or trended higher. Nominal ex-vessel pink salmon prices averaged \$0.39 per pound in PWS, ranging from a high of \$0.53 in 2012 to a low of \$0.23 in 2015. Relatively weak statewide harvest levels for pink salmon in 2018 will help support demand and a stable or elevated price.
- ▶ Chum salmon prices averaged \$0.67 per pound over the same period, including a high of \$0.87 in

Average Nominal Prince William Sound Ex-vessel Salmon Prices (per pound), 2008-2017



Source: ADF&G

2011. Average PWS sockeye prices per pound have grown, reaching \$2.64 in 2017.

- ▶ Near-term threats to the Alaska salmon industry include currency fluctuations, trade disruptions, and run failures. Competition with farmed salmon remains a long-term challenge.



Methodology and Sources

All photos are from ASMI, Franklyn Dunbar, and McDowell Group.

The data used in this report comes from a variety of sources, including PWSAC, Alaska Commercial Fisheries Entry Commission (CFEC), Alaska Department of Fish and Game (ADF&G), Alaska Department of Labor and Workforce Development (DOLWD), and Alaska Department of Revenue (DOR). In addition, interviews were conducted with PWSAC staff, ADF&G employees, and other experts. Estimates provided in this report are based on the best available data. The study team used data from these sources, in addition to proprietary research, to develop economic models to estimate direct, indirect, and induced employment and labor income.

ECONOMIC IMPACT OF

ALASKA SALMON HATCHERIES

Private nonprofit (PNP) salmon hatcheries play an important role in Alaska's seafood industry, the sport and subsistence harvests, and the regional economies of Southeast Alaska, Prince William Sound, Cook Inlet, and Kodiak.

Alaska's PNP hatchery associations contracted with McKinley Research Group to update previous research on the economic impact of hatcheries. This update covers 2018-2023. The research found that annually on average, Alaska's hatcheries accounted for:

4,200 Jobs
(ANNUALIZED)



\$219M
LABOR INCOME

\$103M EX-VESSEL VALUE

=16%

SHARE OF
TOTAL
STATEWIDE
EX-VESSEL
VALUE



14,000+

PEOPLE EARNING INCOME
FROM HATCHERY SALMON



\$576M

TOTAL ECONOMIC OUTPUT

\$346M FIRST WHOLE-
SALE VALUE

=21%

SHARE OF
TOTAL
STATEWIDE
SALMON
WHOLESALE
VALUE

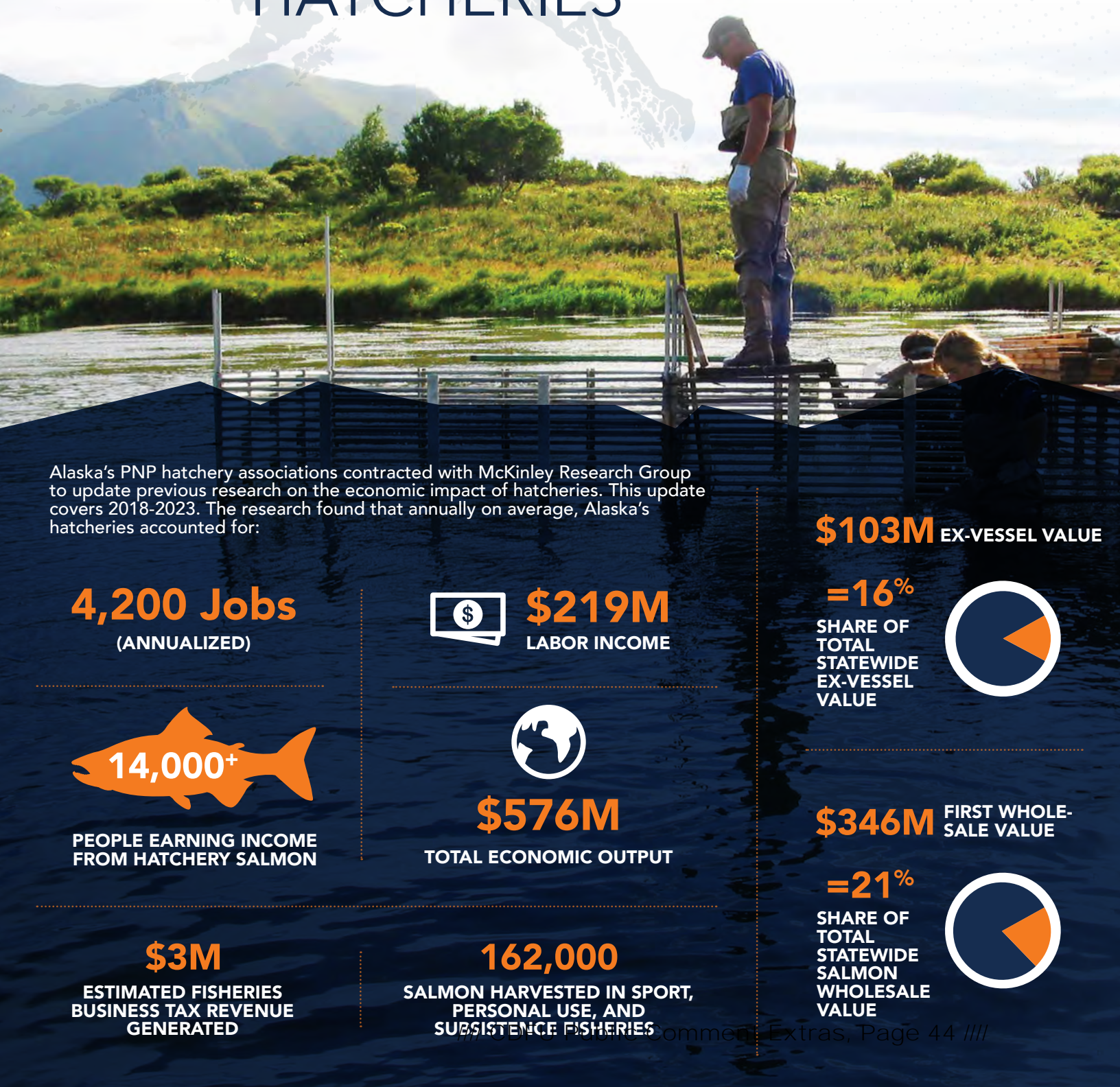


\$3M

ESTIMATED FISHERIES
BUSINESS TAX REVENUE
GENERATED

162,000

SALMON HARVESTED IN SPORT,
PERSONAL USE, AND
SUBSISTENCE FISHERIES



SEAFOOD PROCESSING VALUE

FIRST WHOLESALE

First wholesale value provides one measure of the sales made by Alaska’s seafood processors. It represents the ex-vessel value paid to fishermen plus value added by processing raw products. First wholesale production includes both common property and cost recovery hatchery salmon. Common property salmon made up 77% of the value on average in the 2018-2023 study period. The remaining 23% of wholesale value was cost recovery salmon.

- The first wholesale value of hatchery-produced salmon averaged **\$346 million annually** over the last five years.
- Hatchery-derived first wholesale value represented **21% of total statewide salmon first wholesale value**.
- Hatcheries account for **two-thirds of the total first wholesale value of Alaska’s chum salmon**, about a third of coho first wholesale value and a quarter of pink and Chinook value.
- Processors paid approximately **\$3 million annually in fisheries business taxes** from hatchery salmon. Fisheries business taxes are based on the ex-vessel value of the product purchased by processors.

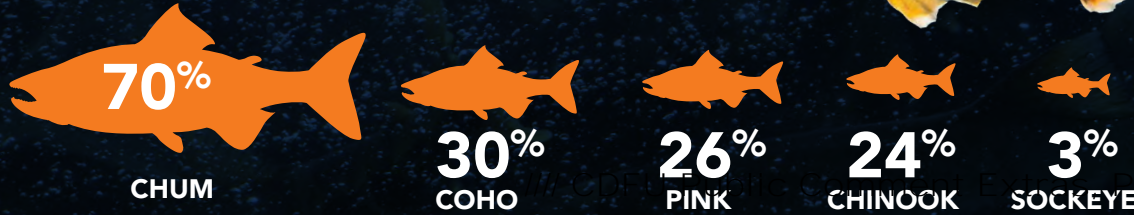
ECONOMIC IMPACTS

- Statewide, approximately **7,500 fishermen (permit holders and crew) earn some of their income from harvest of hatchery-produced salmon**. About 950 annualized commercial fishing jobs can be attributed to salmon produced by PNP hatcheries.
- The employment impact of hatcheries also includes **hundreds of jobs in seafood processing, hatchery operations, and charter fishing. Hatcheries additionally generate thousands of jobs in the support sector**, created as hatchery-generated dollars cycle through the Alaska economy.
- The employment impact of hatcheries totals **about 4,200 annualized jobs, including all multiplier effects. A total of \$219 million in annual labor income** (wages) can be attributed to salmon hatcheries.

ECONOMIC IMPACT OF ALASKA (STATEWIDE) HATCHERY PRODUCTION

	DIRECT IMPACTS	INDIRECT & INDUCED IMPACTS	TOTAL ECONOMIC IMPACTS
COMMERCIAL FISHING			
EMPLOYMENT	950	430	1,390
LABOR INCOME (\$MILLIONS)	\$61	\$20	\$81
SEAFOOD PROCESSING			
EMPLOYMENT	1,010	810	1,810
LABOR INCOME (\$MILLIONS)	\$58	\$29	\$87
HATCHERY OPERATIONS			
EMPLOYMENT	290	340	630
LABOR INCOME (\$MILLIONS)	\$22	\$10	\$32
NON-RESIDENT SPORT FISHING			
EMPLOYMENT	330	100	440
LABOR INCOME (\$MILLIONS)	\$12	\$7	\$19
TOTAL ECONOMIC IMPACT			
EMPLOYMENT	2,580	1,680	4,270
LABOR INCOME (\$MILLIONS)	\$153	\$66	\$219
OUTPUT	\$375	\$208	\$583

HATCHERY PRODUCTION SHARE OF TOTAL FIRST WHOLESAL VALUE, BY SPECIES, 2019-2022



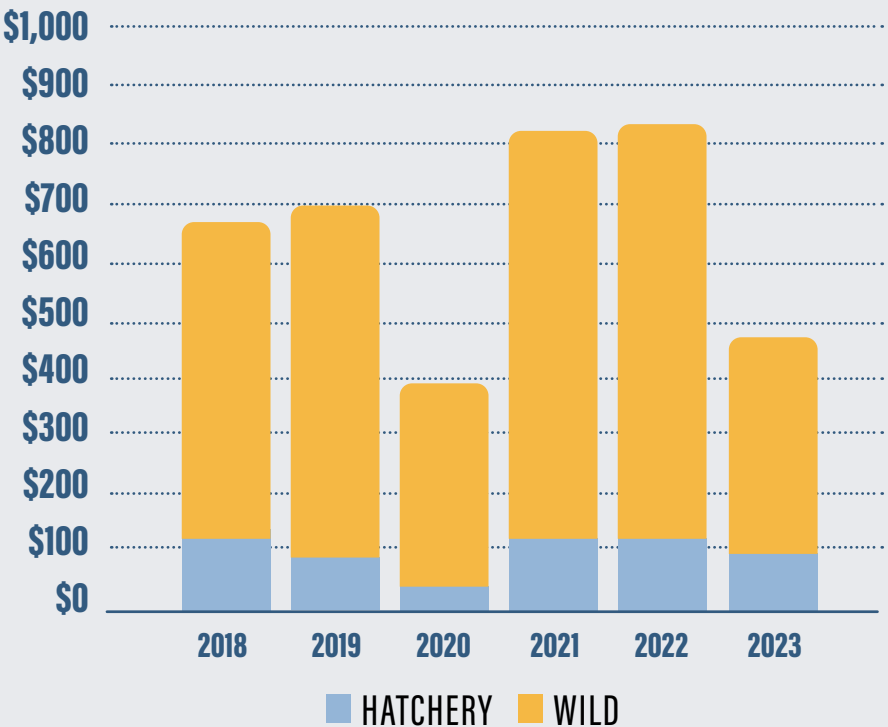
COMMERCIAL FISHING VALUE

EX-VESSEL (COMMON PROPERTY)

Commercial fishing economic activity generated by hatcheries includes both common property fisheries and cost recovery fisheries. Common property fisheries are regular commercial fishing opportunities available to commercial fishing permit owners. Cost recovery fisheries are exclusive fishing opportunities to harvest hatchery salmon to generate revenue for hatcheries. The figures below include only common property fisheries.

- Between 2018 and 2023, commercial fishermen harvested an annual average of **170 million pounds of hatchery-produced salmon worth \$102 million** in ex-vessel value, the gross revenue earned by fishermen.
- **The regional benefits of hatchery production are broad**, including \$51 million in annual average harvest value in Prince William Sound, \$42 million in Southeast, \$8 million in Kodiak, and about \$0.6 million in Cook Inlet.
- **Chum and pink salmon account for most hatchery production**. These two species made up 47% and 36% of hatchery-generated common property ex-vessel value, respectively – followed by sockeye (10%), coho (5%), and Chinook (2%).
- **Most hatchery-generated ex-vessel revenue went to the seine fleet (63%)**, followed by gillnetters (30%), and trollers (7%).
- **Hatchery salmon accounted for 16% of the total value** of Alaska’s salmon harvest over the 2018-2023 period.
- **Hatchery contribution to total salmon harvest was highest in PWS (53%)**, followed by Southeast (33%), Kodiak (17%), and Cook Inlet (3%).
- **Cost recovery income to harvesters is about \$1 to \$3 million annually**, although cost recovery is not included in overall economic impact totals due to data limitations.

HATCHERY CONTRIBUTION TO EX-VESSEL VALUE OF ALASKA’S SALMON HARVESTS, 2018-2023 (MILLIONS OF DOLLARS)



HATCHERY SALMON EX-VESSEL VALUE AS % OF STATEWIDE SALMON TOTAL



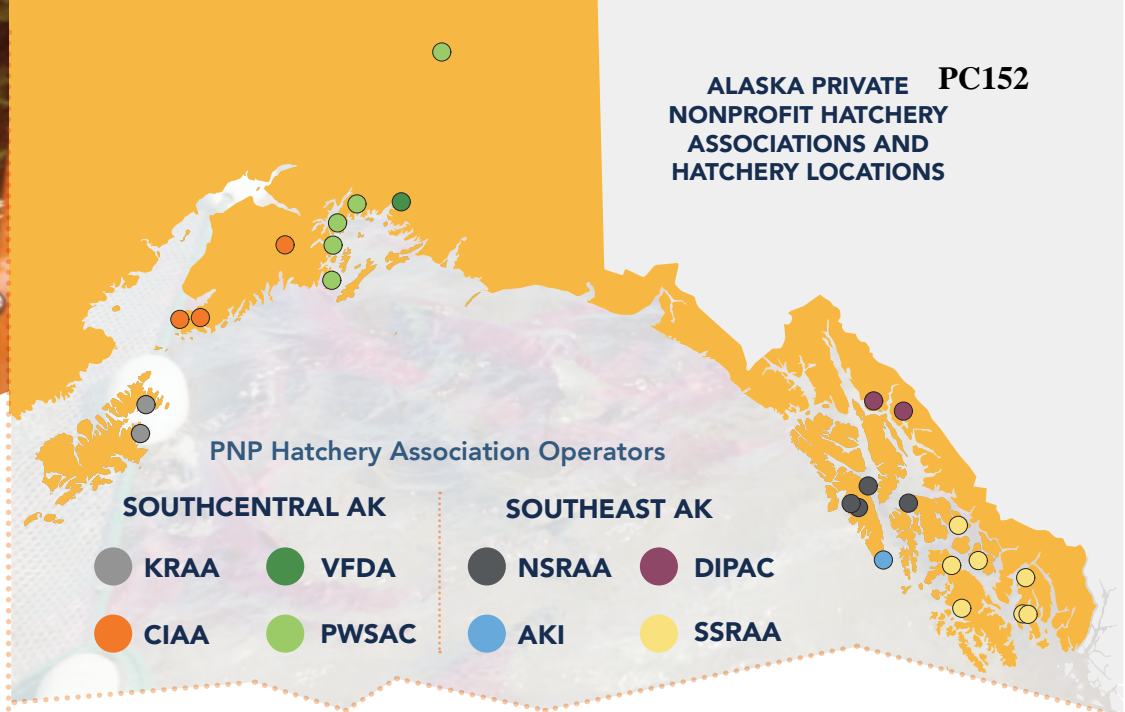


50 YEARS OF PRIVATE NONPROFIT HATCHERIES IN ALASKA

The origin of Alaska's private non-profit salmon hatcheries dates back fifty years. In the early 1970's the Alaska legislature took several steps to address low salmon returns in the state including the creation of limited entry fishing permits, allowing the development of salmon hatcheries, and – in 1974 – authorizing Private Nonprofit Corporations (PNPs) to operate these hatcheries.

As of 2024, eight PNPs operate 26 hatcheries in Alaska. These include a mix of PNP and state-owned hatcheries, which PNPs operate at no cost to the state. There are four additional non-PNP hatcheries: two sport fish hatcheries operated by the state (in Anchorage and Fairbanks), a research hatchery owned by the federal National Marine Fisheries Service, and a tribally owned hatchery operated by the Metlakatla Indian Community.

ALASKA PRIVATE NONPROFIT HATCHERY ASSOCIATIONS AND HATCHERY LOCATIONS PC152



SPORT, PERSONAL USE, AND SUBSISTENCE

- **At least 162,000 hatchery salmon were caught in sport, personal use, and subsistence fisheries** annually. This number is likely a significant underestimate because of limited sampling and limited tagging of coho salmon.
- These fisheries **provide food for Alaskans and generate revenue from visitors attracted to Alaska because of sport fishing opportunities**. There are numerous salmon derbies across the state that are supported by hatchery-raised fish, mostly coho.
- The **four Southeast PNP hatchery organizations support noncommercial harvest with the release of millions of coho, Chinook, chum, and sockeye salmon each year**. Personal use of sockeye; sport charter, marine sport, and shoreside sport catch of chum, Chinook and coho are all significantly supported by these hatchery programs.
- The **two Prince William Sound PNP hatchery associations produce coho, sockeye, and pink salmon caught by noncommercial users**. Hatchery produced coho significantly supports the charter operators in the sound. Coho subsistence fishing in the village of Tatitlek is supported as well. Hatchery raised sockeye salmon are caught in Copper River subsistence and personal use fisheries.
- **The Cook Inlet Region PNP hatcheries produces sockeye salmon** in Cook Inlet's Resurrection Bay, an area that historically had few sockeye runs but now attracts sport fishermen. Hatchery-produced coho salmon also enhance sport fishing opportunities in this region.
- **The Kodiak PNP hatcheries enhance fishing opportunities for noncommercial users along the Kodiak road system** by stocking sockeye, coho, and Chinook salmon, as well as rainbow trout.

Appendix for Proposals 79, 80, 81 - SUPPORT

Table 80-1.-Main Bay Harvest for commercial, sport and subsistence fisheries and Main Bay Hatchery broodstock collection and cost recover, Prince William Sound Management Area, 2014–2023.

Year	Harvest				Hatchery		Total Contribution
	Commercial	Sport	Subsistence	Total	Cost Recovery	Broodstock/Escape ment	
2014	1,189,499	9,791	3,485	1,202,775	0	84,324	1,287,099
2015	1,331,675	4,046	2,332	1,338,053	180,516	31,255	1,549,824
2016	778,515	4,015	1,777	784,307	0	9,846	794,153
2017	552,059	4,291	3,404	559,754	0	48,535	608,289
2018	1,034,159	5,426	1,806	1,041,391	0	11,640	1,053,031
2019	862,311	7,628	2,706	872,645	8,987	9,269	890,901
2020	494,934	9,155	3,011	507,100	232,337	9,735	749,172
2021	446,944	5,394	4,298	456,636	255,837	15,498	727,971
2022	474,706	6,402	2,664	483,772	118,420	10,794	612,986
2023	539,559	4,146	3,629	547,334	226,956	19,828	794,118
Average							
2014–2023	770,436	6,029	2,911	779,377	102,305	25,072	906,754

Appendix for Proposal 84 - SUPPORT

ADF&G Home » Sport Fishing Survey » Southcentral Alaska » 2014-2023 saltwater Sea-run Chinook salmon harvest summary

Alaska Sport Fishing Survey

Regional Summary Estimates

Study Years: 2014-2023 ▾

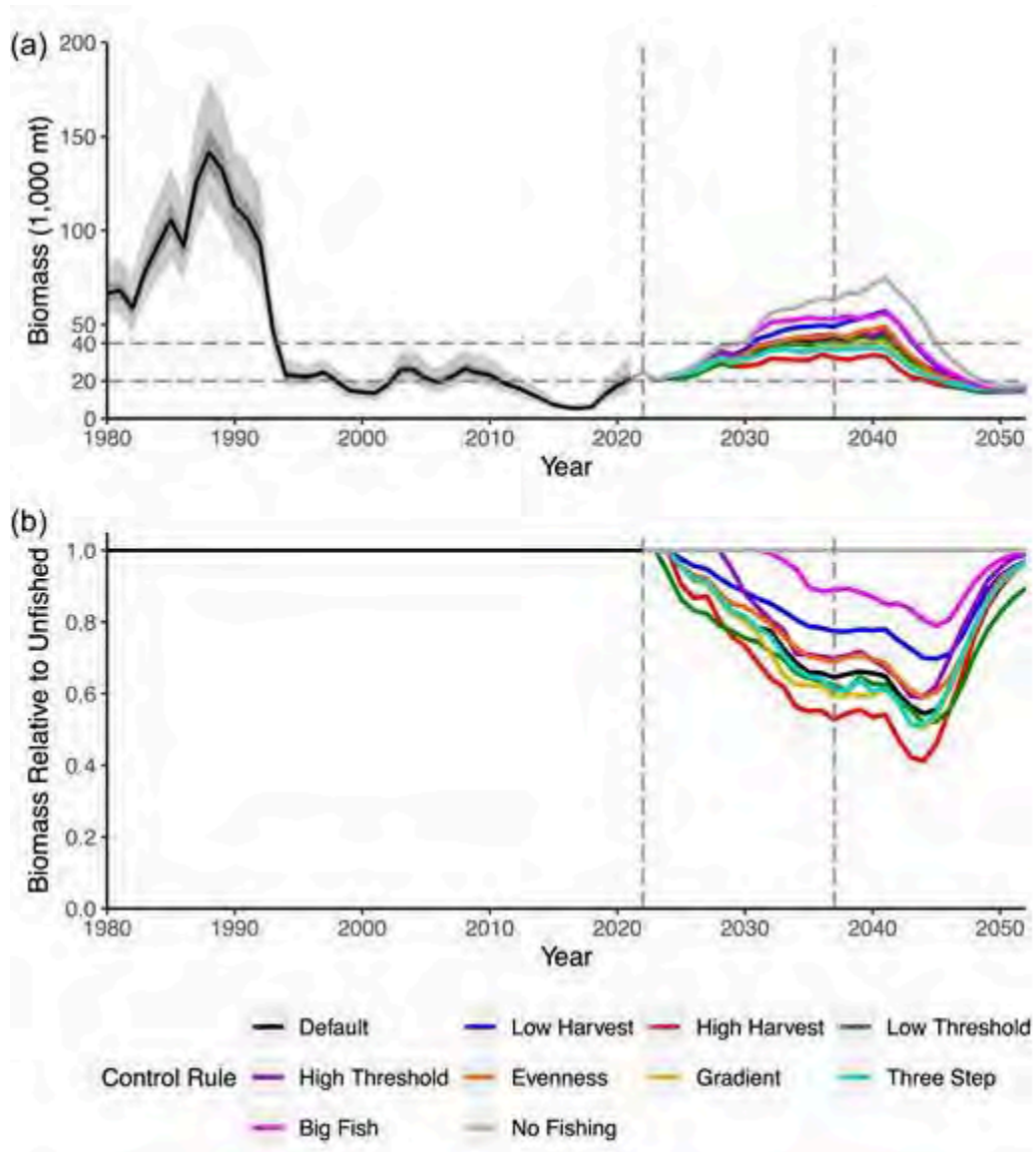
Estimates of Southcentral Alaska sport saltwater Sea-run Chinook salmon harvest, 2014–2023.

SOUTHCENTRAL	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
(J) North Gulf Coast/Prince William Sound	4,582	5,205	5,438	5,202	3,611	7,380	11,054	10,750	7,113	9,432
(K) Knik Arm				0	0	0	0	0	0	95
(L) Anchorage	0	16	20	0	0	0	0	0	0	0
(PS) Cook Inlet saltwater	11,989	19,515	20,005	17,438	18,157	15,650	15,132	18,260	16,760	12,540
(PX) Cook Inlet (Shellfish only)	0	0	0	0	0	0	0	0	0	0
(Q) Kodiak	8,049	6,709	9,499	11,065	7,090	6,647	7,677	11,673	8,011	9,540
(R) Alaska Peninsula/Aleutian Islands	107	172	170	235	359	337	49	0	69	78
(S) Kvichak River drainage		0				0	0			
(T) Nushagak, Wood River and Togiak	0		0	20	205	0	0	0		63
Southcentral Total	24,727	31,617	35,133	33,960	32,422	30,014	33,912	40,683	31,953	31,748

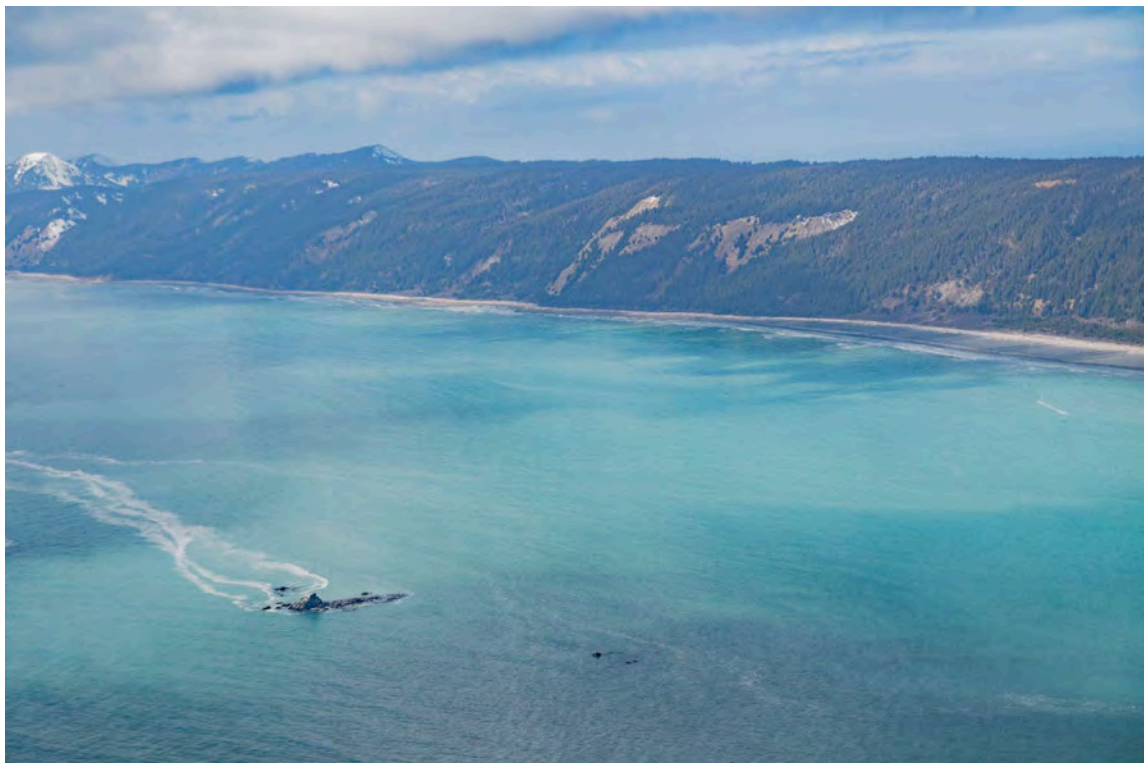
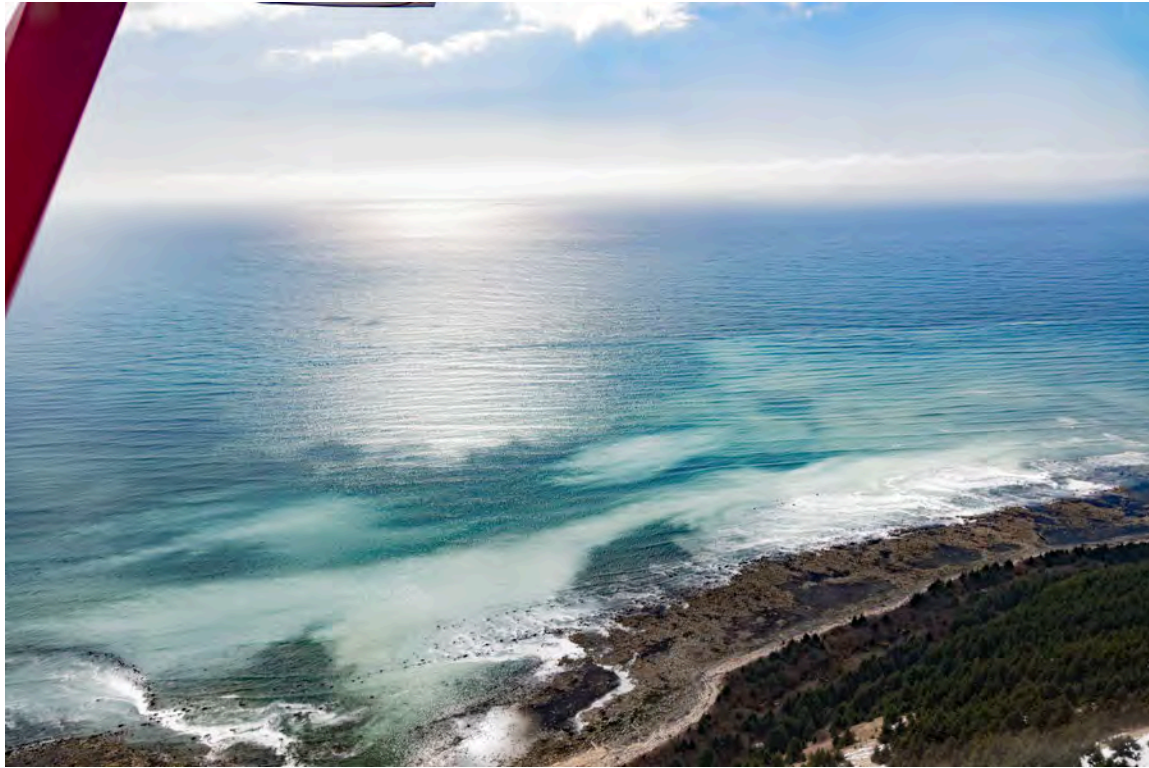
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Appendix for Proposal 97 - SUPPORT



Appendix for Proposal 99 - SUPPORT





Submitted by: Kevan Corella

Community of Residence: Cordova

Comment:

I oppose proposals 52 and 53. The red run on the Copper River is has only missed the escapement goal 1 year out of the last 20, with most years putting more fish than are required into the river. The further reduction of fishing time is not warranted and only results in unnecessary economic impact on a fishery already struggling with economic viability.

Submitted by: Gus Cotten

Community of Residence: Halibut Cove Alaska

Comment:

I would like to voice my opposition to proposition #78.

I'm confident the board will understand the significance of ADF&G opposing this proposal along with countless others, but as a third generation Alaskan salmon seiner and Alaskan resident I would be remiss not to add my name to the list of concerned parties.

The impacts of this proposal would be detrimental to not only the fishermen and processors, but also to all of the industry that works downstream of commercial fishing in our communities and for likely no positive environmental impact.

I would also like to oppose proposals #75 #76 and #77 as they essentially aim to kick seiners while they're already down. The allocation was agreed upon almost twenty years ago and this blatant attempt to skew it more in favor of the drift fleet, particularly during a time of economic crisis for the seine fleet seems harsh and unjustified.

Thank you for your time.

Hello Chairman Carlson-Van Dort and Members of the Board of Fisheries,

My name is Andy Couch. I live in Alaska's Mat-Su Valley near Palmer and have fished for and eaten Upper Copper River salmon since the mid-1970s. With dramatic declines in salmon returning to Mat-Su Valley streams, during the past 5 years, my wife (Frede Stier) and I have harvested a larger portion of the salmon we eat, or share with friends, from the Copper River. In the 1970s I caught king salmon by sport fishing the Gulkana River and caught both sockeye salmon and king salmon by personal use dip netting at Chitina. Since then, I've harvested king salmon by sport fishing in the Gulkana and Klutina River, and more recently my wife and I have harvested most of our sockeye and king salmon by subsistence dip netting the Copper River upstream from Chitina.

I support the concept of Proposals 51, 52, and 53 — but believe that each proposal (opening the Copper River Salmon Management Plan) — if adopted as written — may not be conservative enough to ensure adequate spawning escapements of early returning Copper River king and sockeye salmon, while also sharing reasonable subsistence, personal use, and sport fishing harvest opportunities with the thousands of Alaskans who participate in Upper Copper River fisheries on an annual basis.

I, therefore, suggest that the board consider the following ideas and concepts when considering / adopting changes appropriate for the management plan:

- * Most of the commercial king salmon harvest occurs during May (before the department has a good idea of the inseason abundance of king salmon). Because of this species' earlier run timing, over harvest by the commercial fishery during May can jeopardize attainment of king salmon spawning escapement goals, and exacerbate restrictions and harvest closures for all Upper Copper Users groups — as occurred in 2024.
- * Although the Department develops both daily and cumulative salmon sonar count objectives for each date of the season starting on or before May 15 — during 2023 and 2024 the department has not met a single one of the daily or cumulative objectives during the entire month of May. (Mark Miller with the Wrangell — St. Elias Park Service) has a graph demonstrating the significantly larger rate of commercial harvest during May compared to other portions of the season.
- * Even though not a single daily or cumulative salmon sonar objective has been achieved during the month of May for the past two seasons, ADF&G's commercial manager stated that he managed the commercial fishery **"Conservatively during 2024,"** as he had restricted fishing periods to 12 hours on Mondays and Thursdays, closed waters in the expanded Chinook salmon closure area, and closed the 4th period in May to commercial fishing. Despite these actions commercial harvests during the 4 May periods that were fished totaled 253,183 sockeye, 6,053 kings, 5,613 chum salmon, and 65 coho salmon. Meanwhile the cumulative sonar count for the entire month of May was 34,587 salmon compared to the cumulative objective of 148,339 during the same time period. Conservative management might better be defined as meeting some level of daily and cumulative sonar objectives throughout the run.
- * While some of the salmon harvested during May were likely not bound to spawning areas upstream of the Miles Lake sonar on the Copper River, it is still worth considering that **during May 2024:** More than 7 times as many salmon (264,914) were harvested in the Copper River Commercial Fisheries as were counted past the sonar (34,587).

Management Plan Recommendations: The harvest data suggests escapement needs for discrete early-run Copper River salmon stocks may be better served if the commercial fishery were **managed on a step-up basis** rather than the current [STEP-DOWN BASIS] which perpetuates over harvests of salmon stocks returning during May (and particularly during later spring / colder water years that appear to retard upstream migration).

Rather than opening by the calendar — perhaps the Copper River commercial fisheries should only open after a specific number of salmon are counted past the sonar (the **cumulative management objective** may be an appropriate number, that could better ensure adequate spawning escapements of discrete early-returning salmon stocks, while also better sharing harvestable surplus salmon throughout the run amongst lower and upper river user groups).

Opening the commercial season after a specific level of salmon passage above the sonar would be a good start, and with proper management, could also better ensure more consistent commercial harvest opportunities and spread more consistent salmon harvest rates throughout the run. Such conservative early season management is less likely to be interrupted by emergency closures. Consistent with managing on a step-up basis, however, it is important to note that during May, even when not allowed to fish in the expanded Chinook Salmon closure area, and only fishing a 12-hour period on Mondays and Thursdays, the commercial fleet has demonstrated the ability to harvest over 7 times as many salmon as counted passing the sonar. Therefore, some consistency in sonar passage should be measured before each commercial opener. **Achieving an additional cumulative management objective** before allowing each successive commercial opener would: better meter salmon harvests and escapements throughout the run, better share harvestable surplus salmon amongst ALL user groups, and more closely follows regulatory language in the Policy for Management of Sustainable Salmon Fisheries 5 AAC 39.222.

Additional Considerations:

Early-run Copper River salmon provide all user groups some of the first readily available fresh salmon of the year, and are therefore highly valued by all user groups. Economic benefit for the Upper Copper River sport fishery is directly tied to the number of days of fishing with reasonable king salmon harvest opportunity, and earlier arriving king salmon to the Upper Copper River brings substantially more economic benefit.

Although triggering the start of the commercial season by salmon passage at the sonar may, at times, delay commercial harvests, Copper River salmon will remain the earliest net - caught Alaska salmon available, and, therefore, should maintain their status of premium price for first-of-the season quality salmon.

Thank you for your efforts in conserving Alaska's wild king salmon, and in providing reasonable harvest opportunities for all Alaskans sharing a limited public resource.

I look forward to hearing and watching your efforts for the Copper River resource and its users,

Andy Couch

Submitted by: Chris covert

Community of Residence: Anchorage

Comment:

I have been dip netting on the Copper for 5 years now and I support the keeping of the copper River chitna subsistence harvest. I feed my family off this all winter long. Please consider keeping this natural resource open to the public

Chris

Covert

Submitted by: Kip coyne

Community of Residence: palmer

Comment:

For clarity , proposal voting should have been linked to the proposal, not on separate pages elsewhere. Too confusing, poorly done. I dont want to spend an hour surfing for the proposal.

Submitted by: Robert Coyner

Community of Residence: Eagle River

Comment:

I have been participating in the Copper River personal use fishery since the early 90s to help feed my family. Remembering when the limit was 5 king salmon, never would I harvest that. In the past decade, I've rarely been allowed to keep even one king. Since the limit has been reduced to one and routinely closed by emergency order, I usually am releasing 5 to 10 king salmon back. Additionally, Ahtna corporation trespassing signs have increasingly been put up in an attempt to further restrict Alaskans from utilizing this fishery. I adamantly oppose any further restrictions by the passing of BOF proposal 63, 64, and 65.

Submitted by: Elizabeth Crail

Community of Residence: Fairbanks

Comment:

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

48,51,52,53,58,59,79 - support

In short, I support personal use and subsistence fisheries.

Although commercial fishing is an important industry for our state, the ability of individuals and families to harvest their own fish is more important, and the loss of any of it is incalculable. The disparity in numbers means that any restrictions need to be applied to the commercial industry and not to the individuals who are utilizing the personal use and or subsistence fisheries.

On that subject, I retain grave concerns about the excessive bycatch in the commercial fleets, and in other fishery areas besides the ones at issue for this particular meeting.

Submitted by: Adam Crum

Community of Residence: Wasilla

Comment:

I Oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

Less than 10% of sockeye salmon returning to the Copper River drainage are harvested by Alaskans at the Chitina Personal Use fishery, 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.

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 salmon seiner. Salmon hatcheries are essential to my business, family, lifestyle, and community. Proposal 78 would be detrimental to the entire salmon industry in Prince William Sound. It's completely unnecessary, reckless, and unconscionable to handicap an established industry just to test out someone's theory, which is based entirely on conjecture and cherry picked correlative coincidences. Whether this proposal passes or not, the proponents of this theory will just find any correlation that fits their narrative and try to portray it as a causal link.

Just because a study is peer reviewed does not mean it is settled science. I am fine with more study in this area, but the burden of proof should be on the people who intend to damage our fishery, not on the stakeholders of this fishery to disprove their theory. Do the right thing and oppose 78. 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,

Nicholas Crump

A solid black rectangular box used to redact the signature of Nicholas Crump.

Valdez, Alaska

November 26, 2024

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

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Sincerely,

Nicholas Crump

A solid black rectangular box used to redact the signature of Nicholas Crump.

Valdez, Alaska

November 26, 2024

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

Dear Members of the Board of Fisheries,

I am a commercial fisherman. I was fishing in Prince William Sound 49 years ago when we had no hatchery production. I have served on the CDFU board and VFDA board and know the importance of fish to all Alaska citizens. Watching commercial and sport fishermen enjoy the benefits of hatcheries has been very rewarding to my lifetime of helping the hatcheries in Prince William Sound.

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.

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Sincerely,

Bernard Culbertson

[REDACTED]

Valdez, Alaska

Submitted by: Raven Cunningham

Community of Residence: Cordova

Comment:

Oppose proposals # 51,52,53

Dear Board of Fish, my husband and I are both NVE tribal member commercial fishermen. We depend on this fishery for our main source of income. These proposals would have a negative economic impact on my family, the majority (over 70 %) of tribal member households, and our community. It would increase harvest pressure on particular stocks and take tools away from the managers. Stock diversity issues and biodiversity have not been documented on the Copper River. My family has fished this river for over 100 years and if we were going to see evidence of early season commercial fishing affecting biodiversity it would have already happened.

These proposals also do not account for the time it takes the fish to get from the ocean to the sonar, the fish that go by before the sonar is in place, our delta stocks that do not go by the sonar, and the upwards of over half a million salmon that can be in this staging area at any given time.

Thank you

Submitted by: Andrew Dallman

Community of Residence: Anchorage

Comment:

An increase of Burbot retention and limit would decrease the burbot population.

Submitted by: Albert Daniels

Community of Residence: Wasilla Ak

Comment:

I totally oppose changing the dip net regulations. My family and I rely on this resource to supply. Our fish needs for the year. The charter is a safe and effective way for us to get our subsistence.

Nov. 2024

Dear Alaska Board of Fisheries,

I am in favor of proposals 73 and 74.

This proposal will benefit the fishery by reducing an influx of boats heading for Prince William Sound on years with a larger than average forecast. There are currently too many permits available. Some might argue that this will make it difficult for new fishermen to get into the fishery; However, the initial cost of a permit means nothing if the fishery isn't profitable. Young fishermen will make more as Deckhands and be able to invest in the fishery, if the boat they are working on is more profitable. New permit and boat owners will be able to make payments. This proposal is a much needed benefit to the Prince William Sound Seine Fleet.

I oppose proposal 75 and 76.

This proposal is not in the best interest of either seine or gillnet fishery. The current allocation is one that has been in place for nearly two decades, was developed by both user groups over many years and strives to split the resource equally between the two user groups. Most fishermen have invested in the fishery understanding the allocation plan and understanding its impact on their business. Making these proposed changes will not benefit the fishery but instead disrupt a system that has been in place and that fishing businesses were based upon.

I oppose proposal 77.

PWSAC hatcheries were created to benefit both the seine and gillnet fleets equally. VFDA does not have anything to do with the PWSAC or the PWSAC allocation plan and was constructed in what has always been a seine gear type area. Including VFDA in any type of PWSAC allocation would be catastrophic to the seine fleet. Seinners would only have access to a small percentage of PWSAC salmon. Many family fishing businesses, mine included, would be devastated by changing the allocation in this way.

I oppose proposal 78.

A 25% reduction of egg take at hatcheries in Prince William Sound would mean economic disaster for the Fishermen and Communities of the Area. Most of the salmon fry that are released from hatcheries quickly become food for birds, other fish and marine mammals. Only a small percentage (approx. 2% - 5%) of eggs fertilized at hatcheries return as mature fish. The sustained reduction of egg take at these hatcheries would negatively impact the area and so many families for years to come.

Sincerely,

Brandon Darr

Submitted by: Jessica Davis

Community of Residence: Fairbanks

Comment:

It seems like we are trying to allow stacking permits for commercial fisheries, but trying to remove dual permits for personal use fisherman who hold a permit for both Lower Cook Inlet and Copper River.

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 my family has been commercial fishing in Prince William Sound since before statehood. I am a fourth-generation commercial fisherman, and I hope my son can become the fifth generation. Salmon hatcheries have provided a significant portion of our family's income year after year since returns first began. A 25% reduction would cut my income, which would also reduce my crew's income, ultimately providing less money for all of our families.

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.

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Sincerely,

Edward Day

[REDACTED]

Valdez, Alaska

Stephen Day
F/V Wren
Area E gillnet permit holder since 2018

Commenting on proposals 46, 47, 48, 49, 51, 52, 53, 55, 56, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 70, 71, 75, 76, 77, 78, 79, 80, and 81

To the Board of Fish members,

In considering how to best manage such a complicated resource as a wild salmon run there are so many factors and opinions. I'm sure in the coming weeks you will hear perspectives from all sides and all will be compelling. We all speak passionately about what we care about. Salmon are vital to so many people's way of life. I urge you as an intelligent and conscientious decision maker to consider all that are affected by your decisions, but to do it through the lens of science. Decades of research and hard effort have gone into understanding how to best preserve an abundant return of harvestable salmon on the Copper River and in Prince William Sound. Please do your best to be objective, consider the user groups involved, and to examine how your decisions could be influenced by subjective opinion and political motivation. Your actions now will have repercussions into the future for real people and their livelihood. Thank you in advance for the time and effort you apply to this process.

I am a drift gillnet permit holder in this region and have grave concerns for the future of this fishery, which I depend on as my main livelihood. For the Copper River I am aware that upriver users are also dependent on this run of salmon, but I'd like to draw a comparison between the two. I as a permit holder had to make a significant monetary investment in the way of purchasing a limited entry permit in order to have the right to harvest fish. In that purchase I feel I made an implicit agreement with the State of Alaska that my ability to access the salmon resource in a profitable manner in this region would be upheld. Upriver users also have an implicit agreement with the state to access the same resource, but for the purpose of filling their freezers for the year. The comparison is one of scale. I am reliant on these fish to fund my whole year and future career, and if this run were to fail due to inconsiderate management my career would crash and my investments would become worthless. I believe the state is responsible to me to preserve the viability of this harvestable resource.

I support 46, 47 and 65.

I support all proposals that increase reporting and accountability of harvest in personal use and subsistence fishing along the whole Copper River system. Lower river users and the upriver users should both report more and more often. It is vital that we understand the harvest and manage accordingly. Commercial harvest is very well recorded and reported. It seems important that other users report in kind. Let's get as much data as we can!

I support 49 and 71, but oppose 48.

In reference to proposals that limit for-profit endeavors related to subsistence and personal use harvest: While I support salmon being accessible to Alaskans, I think it is against the legacy of

subsistence and personal use fisheries to monetize their access. This style of fishing has always been a version of self-reliance and community effort. Let it remain so and leave the for-profit operations to the commercial and sport fleet. Also if the cost of successful participation in that fishery rises to a point where it meets or surpasses the cost of purchasing salmon in a retail store, then that fishery can surely no longer be considered a personal use or subsistence fishery.

I oppose 51, 52, and 53.

I am hesitant to support inflexible management mandates. In all but one of the seven years I've fished the early season on the Copper River, we have faced significant closures and restrictions of our fishing time. ADF&G already manages the early season conservatively. Putting such an inflexible restriction in place will remove the best source of early season data we have and handcuff ADF&G in their ability to dynamically manage the fishery. In my opinion more creative solutions to managing the early run are in order. Perhaps more but shorter commercial openers, area restrictions, test fisheries, more sonar installations. But in my opinion rigid closure plans are not the right way to move forward.

I support 55 and oppose 58.

Chinook Salmon are a huge concern for all participants. Let's share the burden of reducing harvest fairly.

I oppose 56 and am neutral on 57.

While permit stacking is an established norm in other gillnet fisheries, I have concerns about creating barriers to new entrants to the fleet. I oppose 56 because it favors long established fishermen and consolidation of resources. 57, requiring there to be two permit holders aboard in order to run a longer net, may allow new entrants a way into the fishery without investing in a vessel initially, or allow a permit holder who experiences a mechanical disaster preventing them from operating their vessel to continue fishing the rest of the season on another vessel. I am concerned that it will become necessary to have a D permit in order to be competitive in this fishery and thus the bar for entry will be even higher.

I support 60, 61, 62, and 64.

Particularly I am in support of 64 that limits people from participating in multiple PU fisheries. I am limited from participating in multiple commercial salmon fisheries as a permit holder. I do think there is room for amendment, perhaps to some wording that says one may not "participate" in multiple PU fisheries, rather than hold permits.

I support 66

Commercial fishing is managed to maintain returns to hatcheries, let other user groups that benefit from the enhanced runs those hatcheries provide also participate in ensuring their continuing success.

I support 67

It's only common sense to keep fish intended for release in the water as much as possible.

I oppose 70

More area geared towards guided operations in a fishery that I believe should not have professional guide participation is not appropriate.

I support 75, 76, and 77

Having participated in this fishery for seven seasons now and having gone through some low years in that time and only seeing Port Chalmers be allocated to the drift fleet twice in that time doesn't make sense to me. I would like to see changes to how this is managed. More nimble and more equitable allocation of the shared resource is in order. Including VFDA fish in the allocation is low hanging fruit. Honestly I was surprised to learn that it hasn't been included in these calculations.

I oppose 78

Reduction of hatchery production by 25% is drastic. It already feels like as common property fishermen we are fighting for scraps left after cost recovery. I worry that such a reduction would reduce production to a point where there would not be enough return for cost recovery to cover operating expenses of the hatcheries and thus would be a death sentence for the whole system. This would be devastating for the viability of this struggling fishery and the people and communities reliant on it. I personally make most of my season's money in PWS, largely off hatchery fish. This change could truly devastate that large portion of my income, and that of many others. Before such an extreme measure is taken, the science must be rock solid and agreed upon by all parties. I haven't seen that to be the case.

I support 79, 80, and 81

These will protect operations for Main Bay Hatchery and eliminate conflicts between user groups. Accomplishing cost recovery as quickly and efficiently as possible benefits all users.

Thank you for listening to my concerns and for doing your due diligence as servants of the residents of Alaska. I love this state as I'm sure you do and I want it to remain a viable place to live and work and thrive. We're all in that fight together.

-Stephen

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 – both seining and gillnetting. Salmon hatcheries in Prince William Sound are responsible for the majority of the pink I have bought throughout my whole fishing career. In seasons in which the wild pink run has been weakened, the hatchery program ensures the protection of those weak runs by providing large amounts of harvestable pink salmon to the commercial fishing interests.

With the efficient modern fishing fleet, a reduction of 25% of egg take would greatly impact the number of salmon the hatcheries would be able to produce. A reduced number of peak salmon in the sound will negatively impact the fishery by limiting the fishing opportunity due to less fish in the districts. Further, reducing the amount of hatchery fish will in term put increased pressure on wild runs.

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.

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Sincerely,

Dylan Deal

A solid black rectangular box used to redact the signature of Dylan Deal.

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 am from Cordova, Alaska, and I am a commercial fisherman with a seine operation in Prince William Sound. The salmon production from the PWS hatcheries is a large part of my earnings. A 25% reduction in egg takes would likely result in a 20% reduction in my earnings, as well as those of my family and crew.

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,

Stuart Deal

[REDACTED]

Cordova, Alaska

November 26, 2024

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

Dear Members of the Board of Fisheries,

Over the last 15 years, salmon hatcheries have provided approximately 25-35% of my annual gross revenues from salmon each year. Proposal 78 sets a bad precedent that can then be used to reduce egg take in SE Alaska, which is my fishery. Additionally, salmon processors operate in multiple regions of the state. Seafood processors and fishermen are experiencing an economic crisis. If the economics and profitability of the PWS region erodes even more for a processor operating in both the PWS and the SE region, it could also negatively impact me. The seafood industry is connected across regions in this way.

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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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.

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Sincerely,

Gig Decker

A solid black rectangular box used to redact the signature of Gig Decker.

Wrangell, 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 co-owner of F/V McCrea LLC, a commercial salmon fishing operation. The hatcheries help to support our family business by directly providing approximately 25-30% of our gross earnings. Proposal 78 would also set a bad precedent that would impact hatcheries in Southeast Alaska. Additionally, it negatively impacts salmon processors operating in both Prince William Sound and Southeast Alaska. Seafood processors are under severe economic pressure, and losing a salmon processor in Prince William Sound could have trickle-down effects in other regions.

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.

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Sincerely,

Julie Decker

[REDACTED]

Wrangell, Alaska

Submitted by: Kayley DeLozier

Community of Residence: Cordova

Comment:

Oppose #51,52,53 and 78

Dear board of fish please oppose 51,52, 53, and 78. I am a Native village of Eyak tribal member and my family depends on the copper river and Prince william sound commerical fisheries for our main source of income. We reside in cordova

year round.

These proposals would have negative economic impacts on my family, the majority of tribal member house holds, and our community.

70 percent of our NVE tribal members are supported by our commercial fisheries.

Thank you.

PC175

Submitted by: Paul Delys

Community of Residence: Fairbanks

Comment:

I stand with the Chitina Dipnetters Association.

PC176

Submitted by: Damien Delzer

Community of Residence: Fairbanks

Comment:

Dear Board of Fisheries,

I strongly support Proposal 14 - the trawling fleet is depleting many stocks vis bycatch. I have personally seen a marked decrease in fish populations, particularly in the past two years. This significantly effects the food for local Alaska families.

I strongly support Proposal 58. If there is a plentiful return, the biologists and commissioners should have the ability to modify the limit.

I strongly support Proposal 59 - similarly if a bountiful and abundant return occurs, allowing additional harvest should be allowed by the commissioner.

I strongly support Proposal 70- this small adjustment will help reduce congestion and risk of those using this area. I have participated for decades in fishing this area and it makes much more sense to allow boats to not be in such close proximity on such a potentially dangerous river.

Thank you for the support of Proposals 14, 58, 59 and 70.

PC177

Submitted by: Michael DeMaria

Community of Residence: WASILLA

Comment:

I support decreasing the commercial catch of Copper River salmon to allow more to enter the river to meet and exceed escapement and increase in-river catch.

PC177

Submitted by: Michael DeMaria

Community of Residence: WASILLA

Comment:

Shut them down until they prove no damage to the bottom.

PC177

Submitted by: Michael DeMaria

Community of Residence: Mat-Su

Comment:

I support the chitina Dipnetters

PC178

Submitted by: Shannon denning

Community of Residence: Fairbanks

Comment:

I have been an Alaskan resident all of my life, born and raised in Fairbanks. The copper river has been a very important staple for my family. Usually, we can catch our limit sometimes we left Chitina with only 5 reds. That has always been the nature of dip netting the copper. I strongly oppose prop.69. I think the lower numbers of escapement should affect the commercial fisherman more than the few boaters that dipnet the copper. If the

escapement numbers are not at target, then the commercial fisherman in Cordova should be limited, and not the local Alaskan who is dip netting to provide for his family.

PC179

Submitted by: Mike DePinto

Community of Residence: Oregon

Comment:

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

PC180

Submitted by: Patricia DeRuyter

Community of Residence: Fairbanks

Comment:

OPPOSE Proposals

44,45,46,47,49,50,54,55,56,57,6

0,61,62,63,64,65,66, 67,68,69,71

SUPPORT Proposals

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

PC181

Submitted by: Kim Dickinson

Community of Residence: Homer

Comment:

Proposals 14 and 16.

I SUPPORT the closing of Prince William sound to all TRAWL Fishing. This is a primitive and destructive fishing technique. This is true for both draggers and mid water trawl. It has been shown repeatedly that the nets of mid water TRAWL actually hit the ocean floor. This rapes the entire ocean and destroys the marine ecosystem, which the consequences are much more complex and vast, then the TRAWL industry wants us to believe.

Submitted by: Temple Dillard

Community of Residence: Fairbanks

Comment:

Please, regulate the bycatch. They're throwing away food to make a dollar, it's wasteful.

Submitted by: Heather Dorsey

Community of Residence: Copper Center

Comment:

I am writing in support of Proposal 16 to close the state-managed Prince William Sound pollock trawl fishery. Trawling leads to concerning levels of bycatch, especially for king salmon, and rockfish. Chinook salmon are struggling in large regions of the state resulting in closures or heavy restrictions of subsistence and sport fishing throughout the state. The National Marine Fisheries Service also estimates bottom contact up to 60% of the time for small pelagic trawl vessels like those used in PWS. The bycatch found in pelagic trawl nets displays an unsustainable fishery that is dragging the seafloor. The PWS trawl fishery also does not have adequate third-party observer coverage or electronic monitoring, so bycatch rates cannot be 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.

Jason Doxey
Fairbanks
[REDACTED]

I oppose proposals 63, 64 and 65. These proposals are little more than unjustified attacks on the ability of Alaskans to harvest salmon for their own consumption.

Proposal 63 would harm Alaskans by placing restrictions on the Chitina personal use season that will make it even more difficult for Alaskans to get to Chitina when the fish are running. There are multiple factors that affect a person's ability to get to Chitina and catch his or her household limit. People have to work around their work schedules, their family members' work schedules, the river level, and, of course, the number of fish present in the personal use fishing area at any given time. There have been years when my brother and I have had to make a second trip to Chitina because we ran into problems (poor fishing/very high water, etc.) on the first trip. Delaying the start of the season as proposed by Ahtna will unjustifiably limit opportunity.

Proposal 64 is not based on sound science. The Chitina personal use fishery and the Upper Cook Inlet personal use fishery are unrelated to each other. Management of Copper River/Prince William Sound-based fisheries should not be connected to Cook Inlet-based fisheries.

Proposal 65 would impose an extreme hardship on Alaskans. There have been years when I have had to make multiple trips to Chitina to catch my limit due to scheduling the first trip based on my work schedule or my brother's schedule rather than based on the abundance of fish in the river. Sometimes the decision to head to Chitina or cancel a planned trip to Chitina are made at the last minute, depending on up-to-date information about river conditions and fish abundance. Switching to a weekly permit system in lieu of a season permit system would be a terrible mistake.

Submitted by: Raven Drake

Community of Residence: fairbanks

Comment:

Oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat

Submitted by: Ben Dubbe

Community of Residence: Homer, AK

Comment:

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

I am an Area E commercial fisherman. I have held an Area E drift permit since 2020. Fishing is my primary occupation and I have participated in several other fisheries in the state. I am also an active sport, personal use, and subsistence fisherman.

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.

Ben Dubbe

Submitted by: Ben Dubbe

Community of Residence: Homer, AK

Comment:

My original comment submission did not have my positions in my letter. Please see attached.

I Support Proposal 25 and I support with amendments Proposals 1 and 26. If there is the sablefish stock to support a fishery, then the opportunity should be there. The pot fishery in SE should give a good framework for a similar fishery in PWS. I only support a personal use fishery because it would help to prevent over exploitation by the charter fleet and has stricter reporting requirements and seasonal limits.

I support Proposal 56 and support with Amendments Proposal 57. There will be new conflicts and problems because of permit stacking. I believe these will be resolved in time and the benefits of a reduced number of boats fishing and more profitable operations will outweigh the negative consequences. It is important that when a boat is fishing dual permits it could be both with a dual permit holder or two individual permit holders on board. It is also important that this could be changed within a season. For example, I believe there would be increased opportunity if say a person has boat troubles, they would be able to go on another boat as crew and stack permits for a while.

I support Proposals 75,76, and 77. The Prince William Sound Salmon Enhancement Allocation Plan is obviously flawed. Looking at the numbers since the current plan was implemented clearly shows its failure and the unequitable allocation between user groups. All three of these plans are trying to solve this problem and all of them would be a step in the right direction. Just because the seine fleet had a poor season does not make this a bad time to fix a problem that has been going on for 19 years.

I support proposal 83 with an amendment. It should read “unguided angler” not “resident angler”. Fishing two rods does not affect the bag limit of an individual and removing chartered anglers would help to reduce abuse and overexploitation with the new rule. This new regulation would most benefit a solo or pair of anglers on their private boat. This is because of the increased efficiency and physical mechanics of trolling. The potential problems of enforcement and additional harvest are very minimal and far less than the potential benefits to the individual.

Ben Dubbe

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 have held an Area E drift permit since 2020. Fishing is my primary occupation and I have participated in several other fisheries in the state. I am also an active sport, personal use, and subsistence fisherman.

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,

Ben Dubbe

A black rectangular redaction box covering the signature of Ben Dubbe.

Homer

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 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 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 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: Thaddeus Dubois

Community of Residence: Chugiak

Comment:

I am writing to express my disapproval of proposals #63 and 64. WRT #63 as someone who has benefit led from this fishery as well as been hindered by the proposing organization I staunchly oppose it. As a current DI454 permit holder, the Ahtna corporation restricting paid access to the land has prevented me from additional opportunities at harvesting a once-in-a-lifetime bison. This proposal is just another effort to restrict using the resources available to all alaskans.

#64: The proposing special interest is continuing the line that recreational users are damaging the stock, with no real evidence. Meanwhile, they are harvesting far more than the recreational users. Considering that returns are so low for the Upper Cook Inlet the likelihood that the resource will be available for recreational use is low. Meanwhile, the commercial interests will be able to deplete the stock. There should be equality in how the resource is used. This proposal does not provide equal use.

Submitted by: Thaddeus Dubois

Community of Residence: Chugiak

Comment:

I am writing to express my desire for a "No" vote on proposal 89.

Submitted by: Thaddeus Dubois

Community of Residence: Chugiak

Comment:

I am writing to express my amusement concerning proposal 50. It is nonsense, and as a user of the Copper River creates not only safety issues, but how would it be enforced? It's a ridiculous proposal.

November 26, 2024

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

Dear Members of the Board of Fisheries,

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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,

Paul Dunatov

A solid black rectangular box used to redact the signature of Paul Dunatov.

Cordova, Alaska

Submitted by: Ralph Durante

Community of Residence: Fairbanks

Comment:

This needs to be better advertised to Alaskans. Alaska resident should be priority one with commercial fishing second. Trawlers don't belong at all

November 26, 2024

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

Dear Members of the Board of Fisheries,

I have been commercial fishing for salmon with my family for 35 years. My family's welfare has directly benefited from our hatchery programs. Hatcheries enhance the wild stocks of PWS salmon and provide a safety net, not fail proof by any means, against weather, environment and foreign episodes that impact this fishery.

Decreasing the egg take levels by 25% in PWS is like shooting ourselves in the foot. Why would we limit our ability to grow and harvest this renewable resource? My family would be impacted because there would be less fish to catch. Catching fish is how we make a living.

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

Please review the following reasons why the Board should oppose and reject Proposal 78:

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

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Sincerely,

Heather Durtschi



Girdwood, Alaska

Submitted by: Max Durtschi

Community of Residence: Whittier, AK

Comment:

Proposal 78 - I am strongly opposed to the reduction of hatchery egg take quotas. This proposal has been put forward at the last two PWS board of fish meetings. Last board cycle its author didn't bother to come to Cordova. However, many fishermen and Alaskans that support the commercial fishing industry made the trip to Cordova on their own dime to defend their livelihoods. This year the same thing will take place. There has been no new science in support of this proposal since last board cycle. The ramifications of this proposal would have profound, long lasting implications on the fisheries and communities tied to them. The state of Alaska and ADF&G have numerous scientists and funding dedicated to researching and preserving our fish stocks. Let them do their jobs, and tell people from Fairbanks to worry about their own backyards.

November 26, 2024

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Juneau, AK 99811-5526

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Sincerely,

Heather Durtschi

A black rectangular box redacting the signature of Heather Durtschi.

Girdwood, Alaska

November 24, 2024

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

Dear Board of Fisheries,

I am a lifelong Alaskan who grew up in Girdwood and has participated in the Prince William Sound commercial salmon fishery every summer of my life. I have heavily invested in my future and fishing career in this area. Our salmon hatcheries are critical to all user groups in Prince William Sound. These hatcheries support the livelihoods of fishing families across the state and are crucial to maintaining sustainability and stability within both the environmental and economic aspects of the fishery. The scope of the negative economic effect that would result from decreasing hatchery production would be extreme. The commercial fishing industry these fish sustain is a vast network of individuals with families who rely on these jobs. You are not just impacting the lives of a few hundred captains, but also their crews, the tender captains and their crews, the local mechanics and hardware suppliers who outfit and supply all our vessels. Then there are the thousands who process, ship, and sell this product. With no actionable evidence that these hatchery fish are having negative effects on wild stocks, there is absolutely no reason for the board to take action on a matter that would cripple hardworking Alaskans who have invested in and committed to being a part of this industry.

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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Sincerely,
Reiker Durtschi

[REDACTED]

Girdwood & Prince William Sound, Alaska

Eastern Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To:
OSM.B24063

NOVEMBER 25 2024

Märit Carlson-Van Dort, Chair
Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the December 10–16, 2024, Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Board of Fisheries (BOF) Meeting.

The Council held a public meeting on October 8–10, 2024, in Fairbanks, and where they took up three BOF Copper River Salmon Proposals. The proposals are of importance to the Council because residents of the Eastern Interior region have positive customary and traditional use determinations for salmon in the upper Copper River. Please see the Council comments below for Proposals 51–53.

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District

The Council **supported Proposal 51** on a unanimous vote. The Council agrees with the proponent that BOF action is needed to mitigate the persistent disproportionate exploitation of salmon stocks with early migratory timing. Continued disproportionate exploitation of early stocks diminishes the overall population diversity of Copper River Sockeye and Chinook Salmon and threatens food security for Copper River subsistence users, particularly those who fish upstream of the Gakona River in the uppermost portion of the Glennallen subdistrict.

The Council wants to emphasize that subsistence needs are not being met in the upper Copper River. Amounts necessary for subsistence (ANS) have only been met two years since 2006 for residents of the Gakona to Slana portion of the drainage (in 2014 and 2015). Commercial fishing must be limited until it is certain that the ANS and escapement goals that are established in State regulations and management plans are projected to be met. The commercial fishery must share in the burden of conservation to protect the future viability of these stocks and to ensure all users

Chair Carlson-Van Dort

can rely on this important resource for generations to come. Additionally, we regularly see the situation play out where Copper River salmon are harvested and sold commercially when subsistence harvest on those same stocks are limited or closed when they finally reach the upper river, which goes against the subsistence use priority.

The early runs of Chinook and Sockeye salmon in the Copper River go the furthest upstream to spawn. This is supported by both traditional ecological knowledge and by biological data. Allowing the first fish to pass upstream is a longstanding tradition of the Ahtna people who are the original stewards of this river and who understood the importance of getting those fish to the spawning grounds. The Council asks the BOF to take action to ensure that the current management plan is revised so that that harvest is more evenly distributed throughout the salmon runs, in an effort to protect stock diversity and provide for more equitable harvest opportunity among users of the resource.

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District

The Council **took no action on Proposal 52** and referenced their support and justification for proposal 51, which addresses similar issues.

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

The Council took **no action on Proposal 53** and referenced their support and justification for proposal 51, which addresses similar issues.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Robert "Charlie" Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record

November 24, 2024

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

Dear Members of the Board of Fisheries,

I'm tied to commercial and sport fishing in Homer, Alaska. I love sport fishing and catch fish every year for my family's personal use. My grandfather moved to Homer and began commercial fishing in 1939.

I've commercially fished, both seining and gillnetting, for over 50 years all around Alaska, particularly for salmon and herring. I am very grateful for the valuable impact the hatcheries in Prince William Sound have had on me, as they have promoted a stable income for my family for generations. The consequent impact on my town is significant.

When fishermen don't bring in a good harvest, the town of Homer feels it across the entire business sector. Reducing the egg take in our hatcheries would be recorded in history as a colossal economic blunder. In lieu of growing Russian salmon harvests, we would be wiser to add another hatchery.

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

Please review the following reasons why the Board should oppose and reject Proposal 78:

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

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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,

Mark Edens



Homer, Alaska

Submitted by: Savannah Egan

Community of Residence: Lake Louise/Glennallen

Comment:

Proposal 89: I think that with the access to Lake Louise and the popularity growing increasing the limit is a mistake and will result in the decimation of the burbot population. I want to see this lake fishable for the next generations and before changes there needs to be more studies done

These comments are for proposals 86, 87 and 88:

I am against these three proposals.

The Sport fishing opportunities around Cordova are very limited. The locations where coho salmon spawn are much larger, more widely dispersed and often in areas where sportsman have no access. Restricting the areas where sportsmen do have access would severely limit their opportunities. This, in combination with increasing commercial fishing at the mouth of the Ibeck creek/Eyak river system (which has severely decreased the late fishing success on these rivers) would effectively take away the majority of opportunities for sportsmen to catch Coho salmon after September 21. The areas mentioned where sport fishing would remain open after September 21: 1) Up to 1.5 miles above the Copper River Highway on Ibeck Creek, and 2) The 18-mile system, up to 1 mile north of the confluence with the Alaganik Slough are areas that are less productive. This proposal would also concentrate sportsmen in a smaller area, and likely influence many to seek other areas than Cordova to fish. This would damage local businesses who rely on end-of-season income from sportsmen. Placing bag limits on sport fishermen who spend thousands of dollars to come to Cordova to fish would likely also drive many away.

Larre Egbert

Submitted by: Ryan Egbert

Community of Residence: California

Comment:

I oppose proposals 86, 87 and 88. My family and I very much enjoy traveling to Cordova to enjoy the outdoors and fishing for coho salmon. We love the area and our time interacting with the local community. We have been doing it yearly for the past decade. Late September is our favorite time to visit. Restrictions on the areas and timing of fishing, as well as more limitations, would likely drive us elsewhere to spend our time and money enjoying 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 the owner of a commercial gillnetter in Cordova, Alaska. I am opposed to Proposal 78. 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.

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Sincerely,

Emily Ekbom

A solid black rectangular box used to redact the signature of Emily Ekbom.

Cordova, Alaska



November 21, 2024

Dear Board of Fisheries members,

As a lifelong Alaskan and owner of El Capitan Lodge for the past 30 years I am writing in support of Proposals 14, 16, and 17 that seek Board of Fisheries action to update Alaska regulations for the pelagic trawl pollock fishery in the Prince William Sound Management Area under 5 AAC 28.263.

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

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

It isn’t right that a single commercial fishery is given free rein to compromise the health of the ecosystem, the businesses, and the livelihoods of the communities of PWS, and the access of Alaskans to subsistence, sport, and other commercial fisheries. I am requesting that the Board of Fisheries pass Proposals 14, 16, and 17. I believe these proposals can address the severe impacts of indiscriminate fishing with trawl gear and protect the vital PWS waters and those Alaskan businesses that depend upon a healthy and robust ecosystem.

Sincerely,

A handwritten signature in blue ink that reads 'Scott Van Valin'. The signature is written in a cursive, flowing style.

Scott Van Valin- Owner

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

Submitted by: Russ Elliott

Community of Residence: Wasilla

Comment:

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

Submitted by: Mark Engan

Community of Residence: Wasilla/Lake Louise

Comment:

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


November 24, 2024

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

Dear Board of Fisheries,

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

Sincerely,
Shelly Erickson


Homer, Alaska

November 24, 2024

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

Dear Board of Fisheries,

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

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

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

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

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

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

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

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

Sincerely,
Shelly Erickson


Homer, Alaska

Submitted by: Ryan Erwin

Community of Residence: Anchorage

Comment:

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

1. Lake Louise has access to the road system which increases the amount of sportfishermen.
 2. Overfishing of Burbot.
 - 3, Technology such as the Garmin Panoptix increases allows sportfishermen and guides to effectively find/target Burbot.
 4. Lack of effective enforcement on the lake. We already see huts with unattended lines.
-

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

11th of November 2024

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

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

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

Cheers,

Micah Ess and Family

Proposals 1, 25, and 26 - OPPOSE

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

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

-Establish a Prince William Sound groundfish personal use fishery

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

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

Proposal 2 - SUPPORT

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

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

Proposal 3 - SUPPORT

-Modify Prince William Sound groundfish pot specifications

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

Proposal 5 - OPPOSE

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

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

Proposal 6 - SUPPORT

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

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

Proposal 19 - SUPPORT

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

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

Proposal 22- SUPPORT

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

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

Proposal 56 - SUPPORT

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

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

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

Proposal 57 - SUPPORT

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

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

Proposal 58 - OPPOSE

-Amend the Copper River King Salmon Management Plan.

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

Proposal 59 - OPPOSE

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

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

Submitted by: Francis Estalilla

Community of Residence: Aberdeen WA

Comment:

SUPPORT Proposals 14, 15, 16, and 17

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

Submitted by: Salvador Estrada

Community of Residence: Eagle River

Comment:

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

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

Support: 48, 58, 59, 70

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.

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

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

Thank you for your time and consideration.

Sincerely,

W Evans

[REDACTED]

Spenard, alaska

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SUPPORT this proposal with CDFU

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

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

Submitted by: Jake Everich

Community of Residence: Kodiak

Comment:

Hello Board of Fish Members,

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

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

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

Best,

Jake Everich

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

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

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

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

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

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

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

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

THE BIG LIE

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

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

Pollock industry representatives have even admitted recently that this has been their dirty little secret. From Laine Welch's reporting² and comments made by industry representatives during Governor Dunleavy's Bycatch Task Force:

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

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

"It has been know all along by many."

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

Wait, what?

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

¹ https://www.akmarine.org/files/ugd/284c1f_e3e23a16ac934ec7ac6752ce4c1939cb.pdf

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

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

The state doesn't directly assess the pollock stock in the GOA, nor in PWS, and instead relies on the federal management process that assesses and establishes the federal Allowable Biological Catch (ABC) and Total Allowable Catch (TAC). When the PWS fishery was established, the state essentially allocated itself 2.5% of the annual pollock ABC as determined by the feds in the Western/Central/West Yakutat Gulf of Alaska. In order to remain below the federally-determined ABC, the feds need to deduct the state fishery allocation from the ABC before then establishing the TAC for the federally-managed fishery. This deduction is done every year in the NOAA Fisheries Stock Assessment and Fishery Evaluation (SAFE) Report³.

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

2. It will result in better observer coverage.

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

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

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

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

The federally managed pollock fishery in the GOA operates under area-specific hard caps: 18,316 Chinook salmon in the Central Gulf of Alaska and 6,683 Chinook salmon in the Western Gulf of Alaska⁴. But the Chinook salmon bycatch in the state-managed PWS fishery does not count against this federal limit. As stated above, if the board closes the PWS pollock fishery, the pollock allocation reverts to the federal fishery, thus ensuring that all Chinook salmon bycatch that occurs while catching GOA pollock will apply to the federal Chinook salmon bycatch limit.

³ The deduction for the PWS fishery can be seen in Appendix table 1D.3 on page 106 of the 2023 SAFE Report for GOA pollock at https://apps-afsc.fisheries.noaa.gov/Plan_Team/2023/GOApollock.pdf

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

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

SUMMARY

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

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

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

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

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

Respectfully,
Grant Fairbanks
Bethel, Alaska



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

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

Introduction

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

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

Gear Definition

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

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

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

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

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

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

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

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

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

A “performance standard” for PTR gear was developed to determine adherence to the intent of the gear definition⁷. The definition of “pelagic trawl”, which differentiates the gear from “non-pelagic trawl” (NPT) or *bottom trawl* (a gear type which is generally prohibited from use for the BSAI pollock fishery⁸), has changed in recent decades in response to restrictions in the catch of prohibited species, and currently rests upon a performance standard which prohibits having more than 20 crab (described also as infauna⁹) on board at any one time. The regulation states that “crabs were chosen for the standard because they inhabit the seabed and, if caught with trawl gear, indicate that the trawl has been in contact with the bottom.” The Stock Author refers to this in the 2023 Essential Fish Habitat review:

Presently the fishery is closely monitored for bottom contact by the mandatory pelagic trawls. If bottom contact were to increase substantially (based on infauna within sets) then this should be evaluated further¹⁰.

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

Pelagic trawl means a trawl on which neither the net nor the trawl doors (or other trawl-spreading device) operates in contact with the seabed, and which does not have attached to it protective devices, such as rollers or bobbins, that would make it suitable for fishing in contact with the seabed¹¹.

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

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

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

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

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

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

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

times. The above restrictions [note: the definition referenced above] about parts of the trawl not contacting the seabed were intended to minimize the bycatches of halibut and crab. Ideally, however, trawl gear definitions should allow for maximum groundfish catches while catching minimal prohibited species catches (PSC) of halibut and crab¹¹.

Subsequently, the definition was expanded to incorporate meshes of 64 inches which allowed for prohibited species catch to fall through the first portion of the net. A comment letter from this action in 1990 states directly that “because a pelagic trawl is commonly fished in frequent contact with the seabed, the larger mesh size is intended to enhance release of halibut and crab if captured¹².” At this time in NPFMC proceedings, analysis makes no mention of “unobserved mortality,” or mortality resulting from fishing effort that cannot be accounted for in hauls that come aboard, such as crab that are crushed under the weight of mobile trawl gear.

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

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

Local knowledge of pollock behavior is helpful to illuminate how this gear functions in action: while pollock generally live above the seafloor (“at least for a significant period during early life and spawning⁸”), pollock are known by fishermen to be on the seafloor at night and slightly above the seafloor during the day, with Pacific cod in an inverse relationship. Pollock are also known to dive in response to threats. Pollock behavior incentivizes use of PTR gear on the seafloor. Indeed, this was described explicitly in 1990 when the definition of PTR was slated for revision. For any infauna such as crab - which cannot move quickly to avoid the net or swim away - that manages to pass over the footrope (Figure 1)¹⁴ and might get caught in the opening of the net, it is virtually guaranteed to fall out of the first series of meshes.

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

¹³[Salmon Bycatch Frequently Asked Questions](#)

¹⁴[Red King Crab Savings Area December 2022](#)

C1 RKC Savings Area
December 2022

Pelagic Trawl Gear

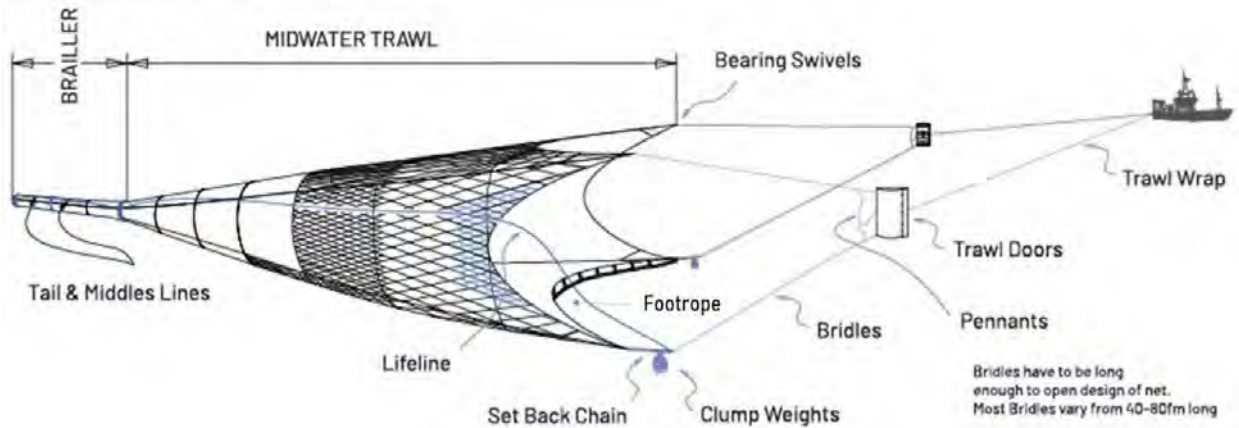


Figure 1. Example of pelagic trawl gear configuration.

Currently, the legal definition of PTR gear actively prohibits meshes smaller than 20 inches between knots in the forward part of the net, and 15 inches between knots in the aft part of the net¹⁵. The Bering Sea Aleutian Island Fishery Management Plan (FMP) for groundfish confirms this intent by describing the capacity for animals to swim *into and out of* the net from the seafloor, but fails to consider the intent of this gear modification with regards to reducing harm to PSC such as crab:

These nets have a large enough mesh size in the forward sections that few, if any, benthic organisms that actively swim upward would be retained in the net. Thus, benthic animals that were found in other studies to be separated from the bottom and removed by trawls with small-diameter footropes would be returned to the seafloor immediately by the Alaska pelagic trawls¹⁶.

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

¹⁵ [Federal Register](#)

¹⁶ [FMP for Groundfish of the BSIA Management Area](#)

Sessile¹⁷ organisms that create structural habitat may be uprooted or pass under pelagic trawl footropes, while those that are more mobile or attached to light substrates may pass over the footrope, with less resulting damage. Non-living structures may be more affected by pelagic trawl footropes than by bottom trawl footropes because of the *continuous contact and smaller, more concentrated, surfaces over which weight and towing force are applied*. In contrast, bottom trawls may capture and remove more of the large organisms that provide structural habitat than pelagic trawls because of their smaller mesh sizes. The bottom trawl doors and footropes could add complexity to sedimentary bedforms as mentioned previously, while *pelagic trawls have an almost entirely smoothing effect*.

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

Benthic Impacts

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

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

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

The estimated bottom contact values from the NPFMC's February 2022 Effects of Fishing on Essential Fish Habitat (EFH) Discussion Paper¹⁸ for the pelagic pollock fleet is as follows:

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

While there is opportunity to further explore the reasons for variance in these rates so that best practices can be realized, we can turn again to recognized pollock behavior to understand likely explanations for the differences: Catcher Processors have the capacity to operate both day and night, using vessels and gear that have a greater capacity for wear and tear; and pollock behavior varies between the Bering Sea and Gulf of Alaska (GOA), for reasons that may include habitat variation and life stages. However, observer rates in the GOA are just 23%, leaving room to question the accuracy of those values¹⁸.

To corroborate evidence of PTR contact with the seafloor, the NPFMC December 2022 Red King Crab Savings Area²¹ discussion paper reported the rate of metal pots used in other fisheries that were caught with PTR gear in the Red King Crab Savings Area (RKCSA) over the past 10 years. Observer data shows that 9-21% of PTR tows in the Catcher Processor (CP) sector and 0-21% of tows in the Catcher Vessel (CV) sector intercepted pot gear, which sits on the seafloor when deployed. Comparatively, the rates for NPT gear ranged from 2-12% of tows in the CP

¹⁸ [Effects of Fishing on EFH February 2022](#)

¹⁹ January to June

²⁰ June to October

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

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

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

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

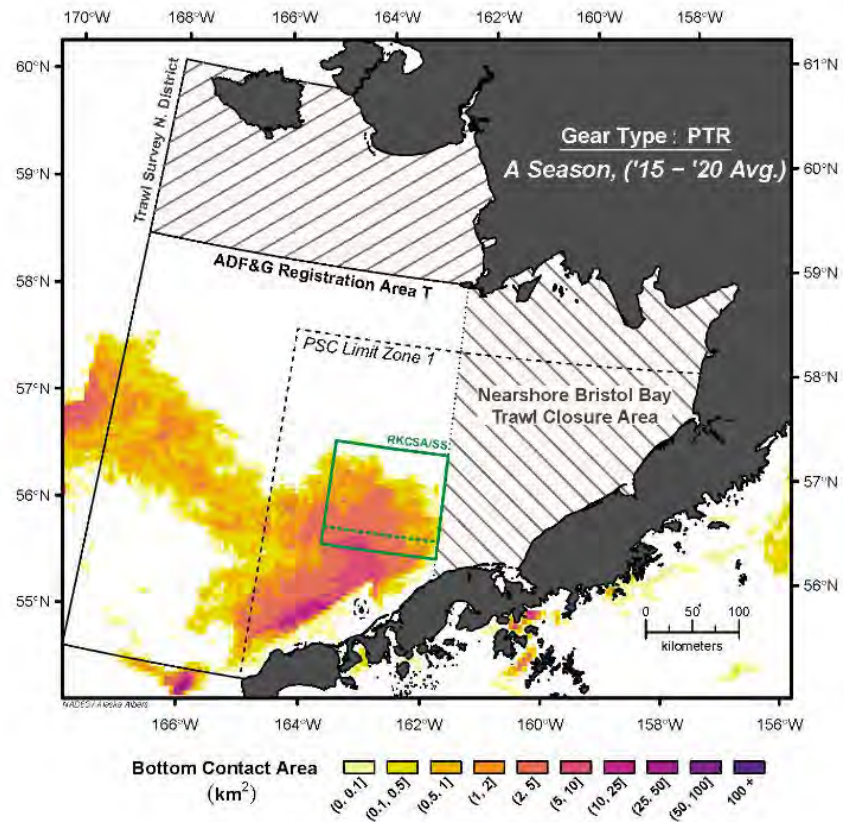


Figure 1 Pelagic trawl average bottom contact area 2015-2020 during A season which includes when crab are molting (soft-shelled) and mating (Source APU FAST Lab).

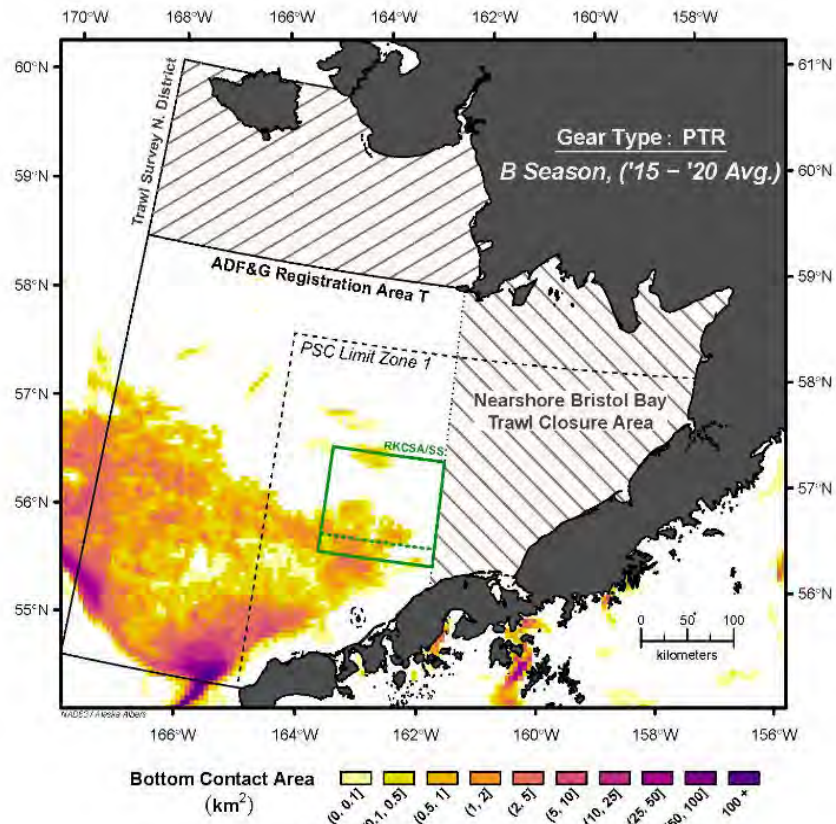


Figure 2 Pelagic trawl average bottom contact area 2015-2020 during B season (Source APU FAST Lab).

Consequences of PTR bottom contact include mortality of crab that is unaccounted for, and this has been the case since the PTR definition was revised in response to crab crashes more than thirty years ago. Some, if not most, crab mortality is not observable and is not currently reported directly in mortality rates which inform stock assessments, though it is known that not all crabs that encounter trawl gear are captured or avoided²². Crab can be injured or killed by contact with any section of trawl gear: doors, sweeps, footropes (thick steel chains or cables), footrope gear and net. Aside from contact, they can also be affected by the silt cloud stirred up by trawl gear dragging across the ocean floor. Rose et. al 2012 provided a limited study of unobserved mortality of tanner, snow, and red king crabs from interaction with bottom trawl gear. Recapture nets were used to retain crab that interacted with the gear but did not end up in the primary net. They found that mortality rates of tanner and snow crab ranged from 4%-15%, and red king crab mortality rates ranging from 9% to 32%²³. It could be estimated that

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

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

those rates could be higher for pelagic trawl nets considering their lack of contact mitigation gear, and the substantial “smoothing” capacity of the steel footrope. Regardless, this demonstrates confidence in a range of statistically significant numbers that could and should be associated with unobserved crab mortality by pelagic trawl gear. **However, the current rate of unobserved mortality accounted for in crab stock assessments and considered in pelagic trawl management standards is 0²⁴.**

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

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

Infauna are considered to be engineers of the seafloor, and besides crab includes bivalves and marine worms, all of which are important for nutrient exchange and essential cycles of sediment stabilization and destabilization. In addition to infauna, benthic habitat in the Bering Sea also includes slow-growing octocorals, sponges and more; categorized most broadly as megafauna (analogous to trees on land) and macrofauna (analogous to weeds²⁵). These species provide greater ecosystem benefits than protective shelter alone, including: medicinal nutrients when consumed, which is increasingly important for species at greater risk of disease with changing water temperatures; and biogeochemical cycling, or pathways by which matter is circulated, which contributes to benthic-pelagic coupling - considered a distinct biological feature of the Bering Sea ecosystem²⁶ which is broadly regarded as the natal grounds for many juvenile species. As changing ocean temperatures affect benthic-pelagic coupling resulting from sea ice, it is likely of increased importance to protect species that contribute to biogeochemical cycling.

²⁴ [Bristol Bay Red King Crab Information April 2022](#)

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

²⁶ [Projected future biophysical states of the Bering Sea](#)

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

Ecosystem Consequences

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

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

A study published in 2002 using axial rod diameters of 12 sea whips indicated slow growth rates in the coral’s first ten years of life, about 4 cm per year; a slightly increased growth rate of about 6 cm per year until the colony is about twenty years old, and then slow again to 4 cm per year from the thirty to fifty years of the oldest colonies studied²⁷. This study concludes that

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

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

Additionally, a controlled study²⁸ published in 2009 assigned colonies to 1 control group and 3 treatment groups, designed to mimic trawl damage including:

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

The impacts described above are serious and increasingly irreversible considering repeated and unmitigated disturbance. Accuracy of assessments measuring the sustainability of the pollock fishery, including but not limited to the Marine Stewardship Council certification, are contingent upon the quality of data layers including fishing effort and habitat classification²⁹, which are demonstrably assumptive and potentially misleading within the NPFMC's EFH process. Sensitive habitat and benthic organisms are being damaged at an alarming rate, with arbitrary rates of recoverability and susceptibility applied in modeling of fishing effects. Those impacts continue without any opportunity for recovery.

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

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

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

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

Potential Actions

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

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

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

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

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

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

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

Table 1

Submitted by: Paul Fairbanks

Community of Residence: Chugiak

Comment:

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

Submitted by: Ralph and Cheryl Feriani

Community of Residence: Anchorage

Comment:

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

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

Submitted by: Angela Ferrari

Community of Residence: Anchorage

Comment:

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

Submitted by: Christopher Ferrieri

Community of Residence: Lake Louise and wasilla

Comment:

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

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

PC215

Submitted by: Hope Finley

Community of Residence: Valdez

Comment:

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

Proposal 73+74

I am in support of proposals 73 and 74.

Proposals 75+76

I am NOT in support of proposals 75+76.

Proposal 77

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

PC215

Submitted by: Hope Finley

Community of Residence: Valdez

Comment:

Proposal 78

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

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

November 26, 2024

RE: Prince William Sound Management Area Proposals 14-17

Dear Board of Fisheries members,

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

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

PWS and state coastal waters are vital to Alaska businesses:

- In the 2022 season, tourism in Alaska is estimated a \$5.6 billion impact, and in 2023, visitors contributing \$158 million² in state revenues. Many of these visitors traveled to coastal communities, booked fishing trips, and traveled on commercial vessels.
- PWS supports strong and vibrant land and ocean based recreation and tourism sectors, critical commercial salmon and directed groundfish fisheries and serve as vital sources of wild food for Alaska Native communities, PWS based communities and residents from as far away as Anchorage and Fairbanks

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

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

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

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

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

Sincerely,

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

El Capitan Lodge
Craig, AK
Scott Van Valin
Owner

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

Sacred Acre Music Festival
Ninilchik, AK
Chris Miller
Director

Alaska Fresh
Cordova and Anchorage, AK
Adra Kusnirova
Owner

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

FishHound Expeditions
Willow and Girdwood, AK
Adam Cuthriell
Owner

Icy Bay Lodge
East Icy Bay, AK
Todd Robertson
Owner

Sakred Salmon
Kenai, AK
Lisa Rodgers
Owner

Taiga Tooth B&B
Talkeetna, AK
Michael Eastman
Owner

Chrome Cult Custom Rods
Juneau, AK
Jason Rivers
Owner

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

Buckshot & Bobby Pins
Skagway, AK
Kristine Harder
Owner

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

Submitted by: Matthew Fitzmayer

Community of Residence: Fairbanks

Comment:

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

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

Submitted by: Jessica Fitzwater

Community of Residence: Girdwood

Comment:

I strongly oppose 75, 76 , 77 and 78

Submitted by: Russell Fitzwater , F/V Gore Point

Community of Residence: Girdwood

Comment:

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

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

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

Thank you

Best Regards

Russell Fitzwater

PC219

Submitted by: Russell Fitzwater

Community of Residence: Girdwood

Comment:

I have already submitted comments

PC220

Submitted by: Rachel Flanagan

Community of Residence: Anchorage

Comment:

Proposal 65: SUPPORT

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

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

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

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

Proposals 46 and 47- SUPPORT

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

Proposal 48-OPPOSE

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

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

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

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

Share the burden of conservation across all user groups.

Proposal 56 and 57-OPPOSE

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

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

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

Proposal 71-SUPPORT

Proposal 72-SUPPORT

Proposals 75, 76, 77-OPPOSE

Written by individuals with no organizational backing/support.

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

Proposal 78-OPPOSE

Written by individual with no organizational backing/support.

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

Proposal 79-SUPPORT

Proposal 80-SUPPORT

Proposal 81-SUPPORT

Proposal 83-OPPOSE

Proposal 84-SUPPORT

Proposal 85-OPPOSE

Proposals 86-88-SUPPORT

David Fleming

Submitted by: Oliver Fleshman

Community of Residence: North Pole

Comment:

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

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

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

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

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

Submitted by: James Ford

Community of Residence: Anchorage

Comment:

Proposal 71. I oppose.

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

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

PC224

Submitted by: Nicholas Fountain

Community of Residence: North Pole

Comment:

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

PC225

Submitted by: Mark Freshwaters

Community of Residence: Skagway

Comment:

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

PC225

Submitted by: Mark Freshwaters

Community of Residence: Skagway

Comment:

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

PC225

Submitted by: Mark Freshwaters

Community of Residence: Skagway

Comment:

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

Submitted by: Craig Frkovich

Community of Residence: WA

Comment:

SUPPORT Proposals 14, 15, 16, and 17

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

Submitted by: John Fuccillo

Community of Residence: Eagle River

Comment:

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

Submitted by: Robert Funkhouser

Community of Residence: Bellingham WA

Comment:

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

Submitted by: Debbie Ganley

Community of Residence: North pole

Comment:

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

Submitted by: Harrison Gardiner

Community of Residence: Anchorage

Comment:

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

Submitted by: Freddie Garza

Community of Residence: Wasilla

Comment:

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

Submitted by: Damon Gendron

Community of Residence: Anchorage

Comment:

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

Submitted by: Keith Genter

Community of Residence: Wasilla

Comment:

I:

OPPOSE Proposals

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

SUPPORT Proposals

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

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

Submitted by: Catherine Giessel

Community of Residence: Anchorage

Comment:

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

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

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

Submitted by: Richard Giessel

Community of Residence: Anchorage

Comment:

I OPPOSE Proposals

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

I SUPPORT Proposals

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

Richard Giessel

Submitted by: Raymond Gilbert

Community of Residence: Anchorage

Comment:

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

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

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

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

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

Thank you for your time and consideration.

Sincerely,

Steven Gildnes

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

Cordova

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 1, 25, and 26 - OPPOSE

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

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

-Establish a Prince William Sound groundfish personal use fishery.

The proposal 25 author states that the sablefish 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

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

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

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

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

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

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

OPPOSE this proposal with CDFU

Proposal 48 - OPPOSE

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

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

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

SUPPORT this proposal with CDFU

Proposal 49 - SUPPORT

Prohibit transport services in the Glennallen Subdistrict.

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

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 51, 52, 53 - OPPOSE

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

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

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

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 55 - SUPPORT

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

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

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

Amend the Copper River King Salmon Management Plan.

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

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

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

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

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

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

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

-Modify the annual limit for the Chitina Subdistrict.

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

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

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

SUPPORT this proposal with CDFU

Proposal 62 - SUPPORT

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

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

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

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

OPPOSE this proposal with CDFU

Proposal 63 - OPPOSE

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 64 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 65 - SUPPORT

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 66 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 67 - SUPPORT

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

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

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 68, 69 - SUPPORT

-Prohibit dipnetting from a boat in the Chitina Subdistrict.

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

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

OPPOSE this proposal with CDFU

Proposal 70 - OPPOSE

Extend the lower boundary of the Chitina Subdistrict.

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

SUPPORT this proposal with CDFU

Proposal 71 - SUPPORT

Prohibit guiding in the Chitina Subdistrict.

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

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

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

SUPPORT this proposal with CDFU

OPPOSE this proposal with CDFU

Proposal 78 - OPPOSE

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

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 79 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 80 - SUPPORT

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

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 81 - SUPPORT

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

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

OPPOSE this proposal with CDFU

Proposal 83 - OPPOSE

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

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

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

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

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

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

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

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

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 96 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 98 - SUPPORT

Align Prince William Sound herring and salmon management area descriptions.

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

SUPPORT this proposal with CDFU

Proposal 99 - SUPPORT

Define commercial herring fishery districts in Prince William Sound.

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

SUPPORT this proposal with CDFU

Proposal 100 - SUPPORT

Adopt a Kayak Island District herring management plan.

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

SUPPORT this proposal with CDFU

Proposal 102 - SUPPORT

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

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

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

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

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

Submitted by: Steven Gildnes

Community of Residence: Cordova

Comment:

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

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

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

Thank you

Steven Gildnes

Submitted by: Emelyn Gilliam

Community of Residence: Talkeetna

Comment:

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

Submitted by: Peregrine Gilliam

Community of Residence: Talkeetna

Comment:

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

Submitted by: Vern Gilliam

Community of Residence: Talkeetna

Comment:

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

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

Proposal 1- Oppose

Proposal 2- Support

Proposal 4- Support

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

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

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

Proposal 14,15,16,17 -Support

Proposal 19- Support

Proposal 20- Support

Proposal 22- Support

Proposal 23- Support

Proposal 25, 26- Oppose

Proposal 27- Support

Proposal 29- Support

Proposal 31, 32- Support

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

Proposal 42- Oppose

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

Proposal 44- Support

Proposal 46- Support

Proposal 47- Support

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

Proposal 49- Support

Proposal 51,52,53- Oppose

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

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

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

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

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

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

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

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

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

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

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

Proposal 65- Support

Proposal 66- Support

Proposal 67- Support

Proposal 68- Support

Proposal 69- Support

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

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

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

Proposal 71- Support

Proposal 72-Support

Proposal 75, 76, 77- Support

Proposal 78- Oppose

Proposal 79- Support

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

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

Proposal 84- Support

Proposal 85- Oppose

Proposal 86, 87, 88 -Support

Proposal 95- Support

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

Proposal 97- Support

Proposal 98, 99, 100, 102- Support

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

Proposal 102- Support

Submitted by: Shawn Gilman

Community of Residence: Cordova, Ak

Comment:

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

Submitted by: Shawn Gilman

Community of Residence: Cordova, Ak

Comment:

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

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

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

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

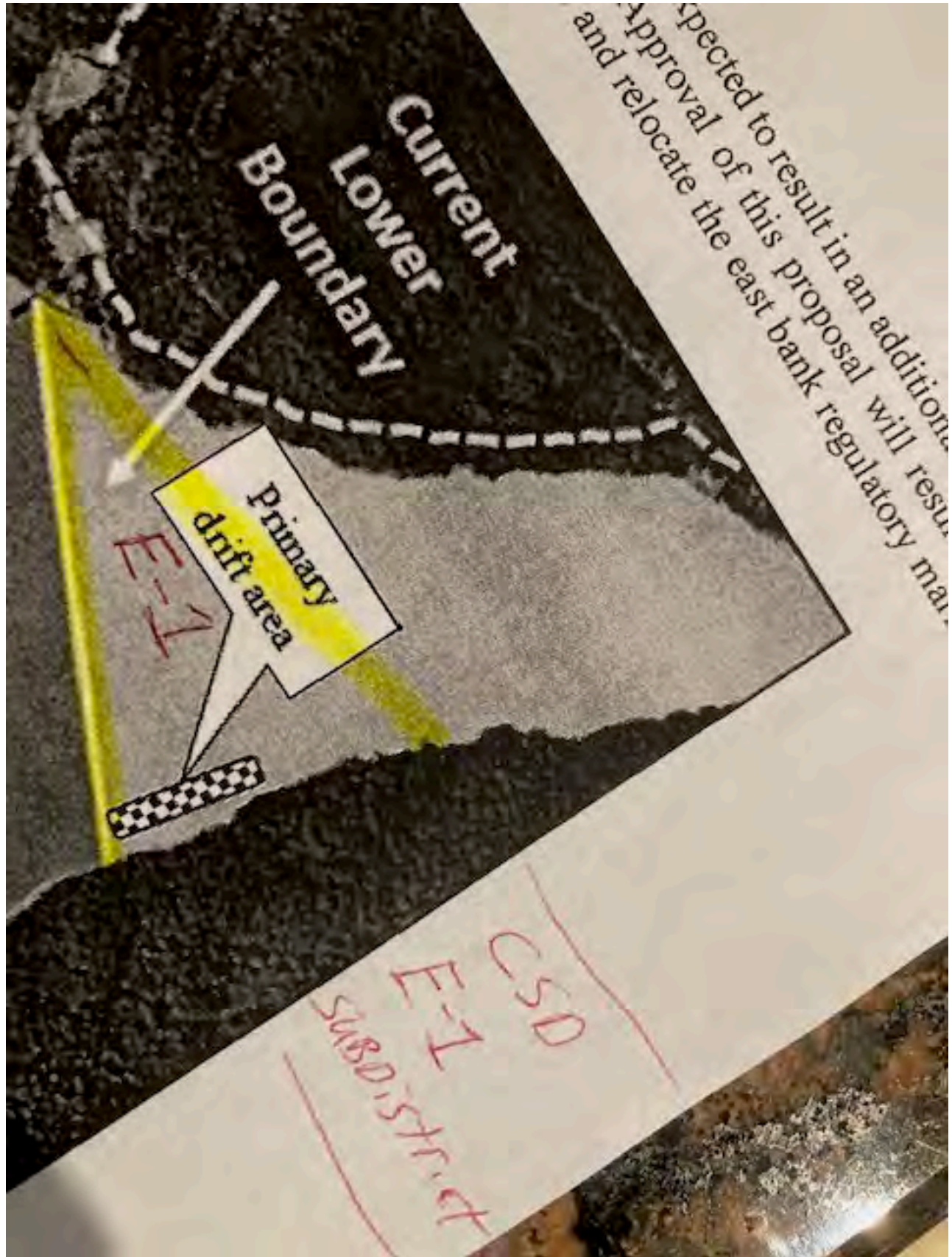
Submitted by: Shawn Gilman

Community of Residence: Cordova Ak

Comment:

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

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



Submitted by: Lincoln Glab

Community of Residence: North Pole

Comment:

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

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

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

Submitted by: Ryan Goldfuss

Community of Residence: Eagle river

Comment:

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

Submitted by: Ivan Gordas

Community of Residence: Eagle River

Comment:

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

Submitted by: Stephen Goudreau

Community of Residence: Valdez Ak 99686

Comment:

Commenting on PWS walleye pollock pelagic trawl fisheries

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

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

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

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

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

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

Please keep the trawlers out of the Prince William Sound.

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

November 25, 2024

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

Dear Chairwoman Carlson-Van Dort and Board Members,

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

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

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

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

Sincerely,



Buck Graham
Captain, F/V Ocean Invictus

Submitted by: Brock Graziadei

Community of Residence: Fairbanks

Comment:

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

Submitted by: Troy Graziadei

Community of Residence: North Pole

Comment:

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

Submitted by: Dustin Grimes

Community of Residence: Palmer

Comment:

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

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

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

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

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

Thank you for your time and consideration.

Sincerely,

John Grocott

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

Cordova and Ilwaco WA

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 1, 25, and 26 - OPPOSE

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

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

-Establish a Prince William Sound groundfish personal use fishery.

The proposal 25 author states that the sablefish GHLL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHLL 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 GHLL.

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

SUPPORT this proposal with CDFU

Proposal 2 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 3 - SUPPORT

Modify Prince William Sound groundfish pot specifications

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 8 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 9 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 10 - SUPPORT

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 13 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 19 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 20 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 22- SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 23 - SUPPORT

Prohibit the retention of sablefish from state waters.

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

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

SUPPORT this proposal with CDFU

Proposal 27 - SUPPORT

Modify rockfish bag and possession limits.

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

OPPOSE this proposal with CDFU

Proposal 28 - OPPOSE

Modify the rockfish area, bag and possession limit.

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

SUPPORT this proposal with CDFU

Proposal 29 - SUPPORT

Create additional provisions for yelloweye rockfish management.

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

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

SUPPORT this proposal with CDFU

Proposal 31 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 32 - SUPPORT

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

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

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

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

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

the daily bag and possession limit is 5 crab per person

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

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

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

OPPOSE this proposal with CDFU

Proposal 33 - OPPOSE

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

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

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

SUPPORT this proposal with CDFU

Proposal 34 - SUPPORT

Repeal the Registration Area E Tanner crab harvest strategy.

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

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

SUPPORT this proposal with CDFU

Proposal 35 - SUPPORT

Modify the harvest strategy for Prince William Sound Tanner crab.

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

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

SUPPORT this proposal with CDFU

Proposal 36 - SUPPORT

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

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 37 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 38 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 39 - SUPPORT

Establish season dates for a commercial Golden King crab fishery.

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

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

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

SUPPORT this proposal with CDFU

Proposal 40 - SUPPORT

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

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

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

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

OPPOSE this proposal with CDFU

Proposal 42 - OPPOSE

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

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

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

SUPPORT this proposal with CDFU

Proposal 43 - SUPPORT

Establish a directed octopus fishery in Prince William Sound.

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

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

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

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

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

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

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

OPPOSE this proposal with CDFU

Proposal 48 - OPPOSE

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

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

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

SUPPORT this proposal with CDFU

Proposal 49 - SUPPORT

Prohibit transport services in the Glennallen Subdistrict.

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

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 51, 52, 53 - OPPOSE

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

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

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

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

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 55 - SUPPORT

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

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

OPPOSE this proposal with CDFU

Proposal 58 - OPPOSE

Amend the Copper River King Salmon Management Plan.

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

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

OPPOSE this proposal with CDFU

Proposal 59 - OPPOSE

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

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

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

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

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 60, 61 - SUPPORT

-Modify the annual limit for the Chitina Subdistrict.

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

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

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

SUPPORT this proposal with CDFU

Proposal 62 - SUPPORT

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

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

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

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

OPPOSE this proposal with CDFU

Proposal 63 - OPPOSE

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 64 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 65 - SUPPORT

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

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

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot

continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

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

SUPPORT this proposal with CDFU

Proposal 66 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 67 - SUPPORT

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

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

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 68, 69 - SUPPORT

-Prohibit dipnetting from a boat in the Chitina Subdistrict.

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

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

OPPOSE this proposal with CDFU

Proposal 70 - OPPOSE

Extend the lower boundary of the Chitina Subdistrict.

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

SUPPORT this proposal with CDFU

Proposal 71 - SUPPORT

Prohibit guiding in the Chitina Subdistrict.

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

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

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

SUPPORT this proposal with CDFU

Proposal 72 - SUPPORT

Close sport fishing for salmon based on water temperature in the Gulkana River.

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

OPPOSE this proposal with CDFU

Proposal 78 - OPPOSE

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

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify

regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

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

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

SUPPORT this proposal with CDFU

Proposal 79 - SUPPORT

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

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

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

SUPPORT this proposal with CDFU

Proposal 80 - SUPPORT

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

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

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

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

SUPPORT this proposal with CDFU

Proposal 81 - SUPPORT

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

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

OPPOSE this proposal with CDFU

Proposal 83 - OPPOSE

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

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

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

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

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

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

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

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

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

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

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

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

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

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly

restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

SUPPORT this proposal with CDFU

Proposal 96 - SUPPORT

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

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

SUPPORT this proposal with CDFU

Proposal 98 - SUPPORT

Align Prince William Sound herring and salmon management area descriptions.

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

SUPPORT this proposal with CDFU

Proposal 99 - SUPPORT

Define commercial herring fishery districts in Prince William Sound.

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

SUPPORT this proposal with CDFU

Proposal 100 - SUPPORT

Adopt a Kayak Island District herring management plan.

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

SUPPORT this proposal with CDFU

Proposal 102 - SUPPORT

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

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

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

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

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

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

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fisherman.

I have been commercial fishing for 6 years.

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

Thank you for your time and consideration.

Sincerely,

Finn Gross

[REDACTED]

Girdwood, Alaska

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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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

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Proposal 43 - Establish a directed octopus fishery in Prince William Sound.: SUPPORT this proposal with CDFU

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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

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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

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Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

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

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

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

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

I am an Area E commercial fisherman.


I am an Alaska resident. I own a bow picker and an Area E permit that I have fished for the past 12 years.

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

Thank you for your time and consideration.

Sincerely,

Geoff Gross

A solid black rectangular box used to redact the signature of Geoff Gross.

Girdwood

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

Submitted by: Robert Haan

Community of Residence: Anchorage, Alaska

Comment:

I support proposition 14. Commercial trawlers damage seafloor habitat, and produce significant amounts of bycatch during a time when our salmon runs are declining. I am born and raised in Alaska, and have relied on salmon my whole life to have for meals 3-5 days per week year round. We need to protect our fisheries for our future generations, and one way to do this is to prohibit commercial pollock trawling. Our state is supposed to put subsistence before commercial, which means that we should not be allowing these commercial trawlers to continue to catch salmon as bycatch that they throw away, while people upriver that actually rely on these salmon for food are forced to not fish due to poor run numbers. We should switch from largely out of state commercial trawlers to Alaskan owned commercial fishers like long liners and trollers because they produce next to no bycatch, and result in actual Alaskan residents profiting off of our state's resources.

Submitted by: Patrick Hagens

Community of Residence: Wasilla

Comment:

I'm in support of stopping trawling until we figure out how to not disturb the bottom of the ocean floor. Bycatch is also completely out of hand and needs dealt with.

Submitted by: Paul hagerdon

Community of Residence: palmer

Comment:

no on proposals #63, #64, #65

any Alaskan willing to do the work should be able to harvest food for their family.

this fishery should not be limited to just 1 ethnic group. that's racist. lets stop fighting and learn to share

Submitted by: Duane Hahn

Community of Residence: Kenai

Comment:

I am opposed to Trawlers in Prince William Sound , we have had a reduction in Rock fish limits for sport fishing the past several years, while the Trawlers continue with their wanton waste of the Salmon halibut and rock fish , The trawlers should not be able to continue to dump thousands of pounds of non target species overboard . If I take my family and go fishing out of Whittier and don't have a deep water release, I will get fined by Fish and Game , if I harvest a fish and throw it away I'm in trouble for Wanton waste , It is disgraceful what the BOF , the Feds and the State of Alaska allow to happen to our resources,

Proposals 51, 52, 53 – Oppose

I am very concerned with this proposal as it relies solely on sonar data as the only early season management tool. Currently, early season commercial drift gillnet fishery management in the Copper River district utilizes a variety of tools including commercial catch data from the first several openers as an indicator of run strength and timing. These first several openers (more than 3) are crucial to understanding what the rest of the run may look like, especially when sonar data is not yet reliable – due to icing conditions in the river, weather, ADFG staffing, or other variables. In many recent years, late season ice at Miles Lake has prevented sonar deployment and functionality, and led to a lower-than-expected sonar count for the date.

Additionally, the sonar count is approximately 1 week delayed from fishery timing, meaning that it takes approximately 7 days for fish to transit from the Copper River flats fishery into the river, and then up to the Miles Lake sonar, where they are counted. There is a significant disconnect between the actual fishery and the geographic location where the in-river number is counted. Closing the fishery prematurely based on a sonar number limits

Additionally, local knowledge from our region suggests that fish often hold up in the river until conditions are preferred, resulting in a delayed count on the sonar. It's critically important to understand that sonar estimations are mathematical averages over time and that actual, real-time information depends on a lot more factors, and on any given day, the sonar goals will be higher or lower than predicted due to the real-world nature of fisheries and the fact that salmon are biological creatures that are sensitive to weather and water conditions and return at various times.

Oftentimes, management will close the fishery down if both the sonar data is low and fishery data indicates low abundance and will allow for additional fishing time if indicated, so current management practices maintain the most flexibility possible for ADFG managers.

From an economic standpoint, the early season fishery is the most valuable to the community of Cordova and not just for the fishing fleet – higher early season prices when market conditions are favorable impact the food security and economic conditions of our entire community, including fishing families, ancillary businesses, and improves the quality of life in a community with few restaurants and high grocery prices.

I urge you to consider these points as you make decisions that have profound impacts on multiple communities in the region in which we live.

Submitted by: Tom Hall

Community of Residence: Valdez/Fairbanks

Comment:

I am in favor of 14,15,16,or 17. These all sound like reasonable proposals. There are simply fewer fish, especially halibut in the sound these days. Let's take this down a notch and let the sound recover just a bit.

Submitted by: Oscar Hall

Community of Residence: Eagle River

Comment:

As a sport fisherman and veteran, I strongly OPPOSE the following Proposals:
44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

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

Submitted by: Valerie Hall

Community of Residence: Eagle River Alaska

Comment:

As a sport fishing person and veteran, I strongly OPPOSE the following Proposals:
44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

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

We must strike a balance and the proposals I oppose are clearly tipping the scale in favor of the commercial fisherman who many live outside the state.

Submitted by: Christine Hamilton

Community of Residence: Wasilla

Comment:

63,64,65

We all need salmon to feed our families

Not just the natives but everyone we need

To be a state not individual tribes every one matters

Board of Fish Members,

My name is Michael Hand, I'm a first generation commercial fisherman from Cordova. I am a permit holder in the seine fishery and I participate in the shrimp, gillnet salmon, sablefish and crab fisheries. Thank you for your time and consideration concerning these important Prince William Sound fisheries and proposals.

Over the course of your week in Cordova, you will hear from ADFG management and fishermen from all user groups. As a commercial fisherman, I see the department and the board of fish as important allies in executing sustainable fisheries here in PWS. For some proposals, such as the herring and cod proposals, ADFG has worked hard with fishermen to understand how to start to maximize the resources available. On the crab proposals though, the department hasn't shown a willingness to help fishermen of the Sound begin to find small scale, sustainable fisheries to participate in. As market conditions continue to be questionable for salmon, it's more important than ever to explore other small scale fisheries that can provide area fishermen with alternative revenue streams. While deliberating on these proposals please consider the responsibility you have to support and bolster the businesses that rely on the resources of this area.

When considering the proposals that address salmon allocation, whether in the commercial fishery or between up river and downriver users, I ask that you stick with the status quo. This is not the time to be arguing amongst user groups, I believe our best move forward is to continue to protect the resource through responsible harvest and shared burden of conservation.

I OPPOSE 56 and 57, gillnet permit stacking, because it would have created a larger barrier to entry for a first generation fisherman like myself. It will increase the cost to participate.

I OPPOSE proposal 78 because the hatcheries of PWS and the state create opportunity for all user groups and support the economy of Alaska.

I OPPOSE 51-53 and 63 because they are based on bad science and will not help the sustainable management of the Copper River resource.

November 26, 2024

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

Dear Members of the Board of Fisheries,

I am from Cordova, Alaska, and I am tied to commercial and subsistence fishing. Alaska's salmon hatcheries support my livelihood as a commercial fisherman. Proposal 78 would impact my livelihood and my family greatly. This reduction of hatchery production at a time when salmon-dependent communities need it most would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

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

Please review the following reasons why the Board should oppose and reject Proposal 78:

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

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

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover,

Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

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

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

Sincerely,

Nelly Hand

A black rectangular redaction box covering the signature of Nelly Hand.

Cordova, Alaska

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

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

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

My name is Nelly Hand, I'm a second generation commercial fisherman, born and raised in a commercial fishing family in Prince William Sound. I am a gillnet permit holder and stakeholder in this fishery. I own and operate a gillnet boat in the Copper River and Prince William Sound district..

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

Thank you for your time and consideration.

Sincerely,

Nelly Hand

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Cordova, Alaska

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.: SUPPORT this proposal with CDFU

Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.: SUPPORT this proposal with CDFU

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.: SUPPORT this proposal with CDFU

Proposal 97 - Reduce the minimum herring spawning biomass threshold.: SUPPORT this proposal with CDFU

Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:

SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.: SUPPORT this proposal with CDFU

Submitted by: Chris Hanna

Community of Residence: Soldotna

Comment:

The banning of Trawling is LONG OVERDUE. Blatant state and federal government corruption is an embarrassment. The NPMFC is stacked with trawl interests. The raping and pillaging of Akaska's waters must stop. The continuance of this archaic and indiscriminate practice opposes all common sense in the name of short term profit for a very small group of greedy individuals. History has proven this practice to be UNSUSTAINABLE time and time again. Only those who are willfully ignorant or being bribed could possibly support the continuation of trawling in the face of crashing fish stocks and the very basics of habitat and resource conservation

Submitted by: Maura Harkins

Community of Residence: Eagle River

Comment:

It is important to keep dipnet fish charters accessible to Alaska residents. The fish we caught this year has fed our family through the tough times of increased grocery costs and inflation. Also dipnet fish charters allow for those with limited mobility the opportunity to harvest.

Submitted by: S. Harris

Community of Residence: Wasilla

Comment:

Close the Prince William Sound walleye pollock pelagic trawl fishery, as follows: Add a new section to 5 AAC 28.263. PWS Walleye Pollock Pelagic Trawl Fishery Management Plan. x) A direct Alaska pollock Pelagic trawl fishery in PWS is prohibited unless; 1) No part or attachment to the Pelagic trawl gear makes contact with the seafloor habitat. 2) There is no bycatch of Chinook salmon in the PWS Pollock Pelagic trawl fishery. Reduce the precipitous rise in Chinook salmon bycatch in PWS taken by the Pollock Pelagic Trawl fishery and reduce disturbances to the seafloor caused by trawling. Numerous Alaskans living in Interior and SouthCentral Alaska gather chinook salmon as part of their annual wildfood source from PWS. Protect the habitat upon which our wildfood source comes.

Tania Harrison
Cordova, AK

Thank you for the opportunity to comment. I oppose proposals 73 and 74. Permit stacking has not proved to be beneficial to the economies of coastal Alaskan communities that depend on fishing. Bristol Bay has implemented a permit stacking system which has resulted in greater economic disparity in the fleet between the 'D' vessels and regular vessels and subsequently fewer local and Alaskan participants. At the 2022 Board of Fish, a proposal (Prop 46) similar to Proposals 73 and 74 failed unanimously. Proposals 73 and 74 would harm Alaskan communities by concentrating wealth to a smaller pool of individuals, blocking new entrants and greatly reducing the number of jobs in the industry, both direct (crewmen) and indirect (boat builders, net hangers, skilled laborers etc.).

The market value of a permit should track the health of the fishery, i.e. the capital needed to buy in should be reasonably correlated to the return on the investment. Altering the fair market value of permits through by-backs or permit stacking initiatives disrupts this pattern. When the capital needed for investment becomes artificially higher than what the industry can provide as a return, then access to the fishery becomes reserved for only those with a significant economic advantage. Fishing then no longer is a viable career path for young residents in coastal communities.

In the original proposals for permit stacking in Prince William Sound and in the current proposal for stacking permits in the drift gillnet fishery (Proposal 56), it was argued that permit stacking would provide another avenue for new entrants to the fishery by allowing them to purchase a permit and "stack" it with another permit holder until they had enough capital to purchase their own operation. Proposals 73 and 74 demonstrates the disingenuousness of that argument. Existing permit holders will have far more access to capital and will effectively cut off any chance for a crewman who wishes to purchase a permit to build their own future fishing business.

Allowing permit holders to purchase and fish two permits goes against the principles of limited entry where limiting the number of participants in a fishery to a given level is needed for resource conservation reasons or to prevent economic distress in a fishery, not for the personal enrichment of a few.

Submitted by: Samantha Hart

Community of Residence: Anchorage

Comment:

PROPOSAL 30 Support, residents need to be able to gather sufficient amounts timely

PROPOSAL 39 Support, allow time for king crab population to replenish

PROPOSAL 42 Support with amendments, disagree with the 2 pot limit for both king crab and shrimp

Submitted by: James Hasskamp

Community of Residence: Homer

Comment:

Please follow the Alaska Constitutional Law as dictated in Article 8 and maintain use of the fisheries resources for common use, subject to sustained yield, with no exclusive or preferential right to a resource by any entity, other than the people (all Alaskans). Stop trawling, too!

November 24, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526


Dear Board of Fisheries,

I am from Seward, Alaska, and I have been a commercial, sport, and subsistence salmon fisherman in Alaska for over 50 years.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,
Arne Hatch

Seward, Alaska

Submitted by: Trevor Haynes

Community of Residence: Fairbanks

Comment:

I believe that the right and access to salmon dipnetting for Alaskans should be strongly protected, as it is an important aspect of food security for many Alaskans, including my family of 4. I generally oppose the liberalization of commercial fishing regulations, and generally oppose the restrictions of personal use dipnetting for Alaskan residents. I also consider conservation of salmon stocks in my decisions to support or oppose specific proposals. Given this, I oppose proposals 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, and 72. I support proposals 48, 58, 59, 70. Thank you for considering my written comment.

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,

Our family were Area E, drift gillnet permit holders/fishers for 15 years, prior to that set netter crew in Main Bay for 3 seasons, and seine crew from 2018-2022. Our son remains in the fishery, Area E, drift gillnet permit holder.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Carol Hazeltine

A solid black rectangular box used to redact the signature of Carol Hazeltine.

Anchorage

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.: SUPPORT this proposal with CDFU

Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.: SUPPORT this proposal with CDFU

Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 23 - Prohibit the retention of sablefish from state waters.: SUPPORT this proposal with CDFU

Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.: OPPOSE this proposal with CDFU

Proposal 27 - Modify rockfish bag and possession limits.: SUPPORT this proposal with CDFU

Proposal 28 - Modify the rockfish area, bag and possession limit.: OPPOSE this proposal with CDFU

Proposal 29 - Create additional provisions for yelloweye rockfish management.: SUPPORT this proposal with CDFU

Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.: SUPPORT this proposal with CDFU

Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.: OPPOSE this proposal with CDFU

Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.: SUPPORT this proposal with CDFU

Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.: SUPPORT this proposal with CDFU

Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.: SUPPORT this proposal with CDFU

Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.: SUPPORT this proposal with CDFU

Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.: SUPPORT this proposal with CDFU

Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.: OPPOSE this proposal with CDFU

Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.: SUPPORT this proposal with CDFU

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.: OPPOSE this proposal with CDFU

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Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.: OPPOSE this proposal with CDFU

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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

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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: Mark Hazeltine

Community of Residence: Anchorage

Comment:

Opposing 51 52 53

Closing the copper river drift fishery to allow the cumulative goal to be met poses a large risk of over-escapement of the run. Frequent shorter-duration periods would be a better tool to manage catch and continue to collect useful management data from the fishery. Closures in the fishery in the past often lead to large numbers of fish passing through the miles lake sonar, resulting in over escapement of the run. The copper river drift gillnet fishery is the front line of the management plan and data collection.

Prop 59

An increase in the allocation of salmon to personal use and sport fisheries is not justified as the increased pressure in these user groups comes from a population that has not historically or geographically harvested copper river salmon. As with other limited wildlife resources in Alaska, when the resource is not abundant enough to meet the demand of the user group, permits should be issued on a limited basis.

PC275

Submitted by: Bradley Hefele

Community of Residence: Wasilla

Comment:

I oppose 63, 64,65, these are totally unacceptable!

PC276

Submitted by: Wayne Heimer

Community of Residence: Fairbanks

Comment:

Proposal 51: I'm not so sure the BOF exists to decide who gets which or how many salmon. The Boards of both Fish and Game exist for the purpose of conservation and development of Alaska's fish and game resources. I can see, based on tradition and the implicit allocative function of regulations, how this looks like allocation responsibility.

HOWEVER, there is also a State subsistence priority law that establishes subsistence (for all Alaska residents) as the highest priority use. Should the BOF be the entity to decide whose subsistence (commercial livelihood or immediate food need) is the higher priority?

that sounds like policy making to me, and since policy is the exclusive province of the legislature, it looks like the legislature has already decided immediate food needs are the higher priority. The Board of Fisheries may be 'out of its lane' in deciding allocations by user subgroup.

Submitted by: Richard Heller

Community of Residence: Butte

Comment:

I've lived in Alaska since 2005 when I came up to Fairbanks with the Army. I now live in the Matanuska valley now on Bodenberg Creek, a salmon protected creek. I have fished all over the Kwnai Peninsula and upper cook I let in the past 16 years. I'm dumbfounded when I see what the trawler industry is and has been allowed to do to the federal waters. Facts, trawlers have decimated the ocean in other areas of the world and those countries shut them down. The amount of carbon that is released from this extreme fishing method is also horrendous. Please for the love of this plant and our fish that have disappeared, STOP TRAWLERS mid and bottom. Please. The Yukon people are hurting and I just don't get why the push back from state and federal agencies. Just order them to stop, period.

Alaska Board of Fisheries
 Alaska Department of Fish and Game
 P.O. Box 115526
 Anchorage, AK 99811-5526

Re: Oppose Proposals 14, 15, 16, and 17 - PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

Hello my name is Mike Helligso. I am a life long Kodiak resident, commercial/subsistence/sport fisherman and a father of three. I started commercial fishing at an early age and have participated in various state and federal Alaskan fisheries through the years including trawl fisheries, salmon, crab and halibut. I love living, working and raising our kids in Alaska, especially in a small tight knit coastal community. Kodiak, like many coastal towns depends on a healthy fishing industry and I've always taken pride in not just being a positive contributor to the community but also making sure future generations of fishers have the opportunities I did. The first time I fished pollock in the winter, was 1997 and the vessel I was on fished out of Seward. The manager of the cannery there explained how the PWS pollock fishery was created as a benefit for the PWS area communities that wanted to participate in processing pollock. I thought that was a pretty good idea for supporting small coastal towns. A few years later the vessel I was crewing on fished pollock in PWS and I've been fishing pollock up there pretty steady through the years ever since, first on deck and now running a family owned vessel.

After participating and being a current participant, in different fisheries around the state I truly believe that ADF&G runs the most communicative, comprehensive and thought out fishery in PWS, with the ability enact measures at a moments notice. Fishing being as fluid as it is requires good communication and the managers of the fishery don't get much sleep at night as the fishery unfolds. I've often wondered how better off other fisheries would be if they were managed in the same style....bycatch numbers taken in pounds instead of pieces that better reflects their all cause natural mortality, low bycatch caps that fluctuate with quota, stringent communicating/reporting, limited number of vessels fishing, retention of all species/ no discarding ect. To me the ADF&G management of the fishery is a great example of effective, collaborative fisheries management.

Even though PWS pollock hasn't been processed in communities around the PWS area in awhile it still is a very important fishery to Kodiak. The pollock up in PWS seem to congregate to spawn sooner than the fish in the central gulf. Fishing on a higher concentration of fish is a beneficial way to mitigating bycatch. A lot of pollock fishing in the beginning of the year starts in PWS for this reason. The Kodiak vendors, cannery work force, longshoreman, fishers ect have been depending on that fishery for awhile now to help pay bills right after the holidays.

Now after participating in the PWS pollock fishery for decades I read these proposals (14-17) as some people think there is a problem with the fishery, not based on merit but on emotion. I know fishing in the state is going through some terribly turbulent times right now but quite frankly these proposals are barking up the wrong tree.

Prop 14

Midwater trawling in PWS is done with very little bottom contact. Its completely different from the shallow plains of the Bearing Sea where pelagic gear makes bottom contact way more then midwater fisheries on this side of the Chain.

PWS is an amazing area for sure with lots of deep water and steep/hard shelves and banks under the surface. Most midwater fishing in PWS is along these steep and hard edges/banks in the midwater column. If a midwater trawl were to accidentally touch these banks it'd get shredded and either discarded or it'd take time and money to fix plus one loses out on fishing time..... bottom contact is not advantageous. In regards to 0 chinook bycatch, that simply isn't pragmatic to execute the fishery. Lately the GOA has been getting inundated with out of state hatchery chinook, on a level that has never been seen before and showing no signs of slowing down with no regulated caps on those hatcheries. The PWS ADF&G numbers from 2020-2023 show the chinook that are getting caught are getting smaller, same as other fisheries in the Gulf that are seeing large amounts of smaller bait sized hatchery chinook. There is a lot of small out of state hatchery chinook in Alaskan waters.

Prop 15

I believe the standard that ADF&G has set is very reasonable. As quotas fluctuate a static bycatch cap wont reflect the intent of setting bycatch limits. Small pollock quotas would have a larger percentage of bycatch allowance and bigger quotas with smaller caps would hinder the fishery. Management has the tools to adjust bycatch caps by species and close down areas immediately.

Prop 16

This proposal is based on a belief, with no evidence to support it.

The belief in this proposal is that rockfish are hard on the bottom at all times and never come off....this is not the case. You would be hard pressed to find anyone that's made a living fishing on the ocean or fished in freshwater that wouldn't agree that fish behavior changes throughout the day and especially between dark and daylight hours. In my experience commercial fishing, when night comes the underwater habits of fish and feed changes. Fish and feed in the midwater column swim up shallower in the column and fish come off the bottom....it seems like lots of things like to lift in the dark. Even species of flat fish prefer being up in the water column at night.

I have participated in directed rockfish fisheries for years and can attest that yes rockfish will go on the bottom but they also travel up in the water column quite a ways.

Prop 17

This proposal includes redundant monitoring measures.

Management has the right to place on board observers already. I have fished the PWS pollock fishery with both state and federal observers on board. At times we left port heading out for a federal fishery trip with an observer and a spot in the PWS fishery opens up. Now even though the observer was placed for a federal fishery the observer company instructs their observer to monitor/sample the PWS fishery as they would a federal pollock fishery. All trawlers are used to taking observers and now that electronic monitoring is becoming more common, vessel have put on EM systems on but I'm not sure what percentage of GOA trawl vessels are EM capable at this time. The trawl fishery is used to being heavily monitored but electronic monitoring on top of onboard

observers seems excessively redundant/inefficient especially with finances being tight everywhere these days. \

In closing I feel that it is very important to have collaboration and conversations on issues effecting our state and the people in it but these proposals were made by people, based on emotion, with a certain unawareness of the particulars of the fishery. I would like to see all fisheries thrive for generations and knocking down a successful, sustainable one isn't the way. Thank you for you time.

Sincerely,

Mike Helligso

A handwritten signature in black ink, appearing to read "Mike Helligso". The signature is stylized with a large, looped "M" and a cursive "Helligso".

Submitted by: Jenna Hem

Community of Residence: Chitina

Comment:

47-OPPOSE Redundant, unnecessary

48-SUPPORT Alaskans should have option of safely and effectively fishing with guide service if desired. Not everyone who is subsistence has an expendable boat or ability to maintain or locate a fish wheel.

49-OPPOSE Alaskans should have access to a transport service. Not everyone has an expendable or appropriate boat.

51,52,53-SUPPORT Scientifically based and the only proposals that would directly support and benefit the longevity of these fish runs, especially Chinook salmon.

55-OPPOSE Badly defined proposal, whiny

60,61-OPPOSE This is a very important food source for a lot of Alaskan families

62-OPPOSE whiny, seeks to take food from mouth of Alaskans and instead harvest for own profit

63-OPPOSE Loss of opportunity for Alaskans

65-OPPOSE Redundant

68-Seeks to take away fishing opportunity, unnecessary

70-SUPPORT Safety

71-OPPOSE Misappropriates blame for bad king runs, seeks to destroy livelihoods, anecdotal info with no scientific basis

Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Anchorage, AK 99811-5526

November 26, 2024

Re: **Oppose** Proposals 14, 15, 16, and 17 – PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

I am writing to formally oppose proposals 14, 15, 16, and 17 submitted to the Board of Fish, which would effectively shut down the Prince William Sound (PWS) pelagic trawl fishery. As the captain of the Kodiak-based F/V *Vanguard*, I can attest to the critical importance of this fishery for my business, my crew, and coastal communities across Alaska.

The Vanguard and its crew have spent the majority of their careers fishing in Alaska, and we are fully committed to ensuring the longevity and sustainability of this fishery. The PWS pelagic trawl fishery is an intensely managed fishery, with stringent regulations in place to ensure sustainability. These regulations include mandatory check-in and check-out procedures for fishing vessels, daily catch reporting, a fleet of no more than 6 to 8 vessels operating in the Sound at any one time, and close coordination with fisheries managers.

For many vessels, including the Vanguard, the PWS fishery represents one of the first opportunities of the year to earn revenue. It provides essential income to support our families, our business, and the coastal communities that depend on this industry. In a time when the seafood industry is in crisis and food security is a growing concern in Alaska, shutting down this fishery would be catastrophic not just for fishermen like myself, but for the broader economy of our state.

The Alaska Department of Fish and Game (ADF&G) staff, who are experts in managing this fishery, have expressed opposition to all four proposals and are confident that they can continue to effectively monitor and manage the fishery. The department already has the authority to deploy observers on fishing vessels, and the Vanguard is fully compliant with monitoring requirements. We have carried at-sea observers during federal fisheries when required and are actively participating in the Electronic Monitoring (EM) Program for the federal pelagic pollock fishery, where our cameras are on at all times.

In addition, the PWS pelagic trawl fishery operates under strict bycatch limits, and we are required to retain all pollock, rockfish, and salmon caught. Any catch exceeding the trip limits must be surrendered to the State of Alaska. The ability of the ADF&G to issue Emergency Orders to modify bycatch caps ensures that the fishery remains well-regulated and able to adapt to changing conditions.

Another significant concern with shutting down the PWS pelagic trawl fishery is the potential impact on other important Alaskan fisheries, particularly juvenile pink salmon. Eliminating this fishery could lead to increased predation on pink salmon in the Sound, threatening another vital sector of Alaska's fishing industry.

For these reasons, I strongly oppose proposals 14, 15, 16, and 17. I urge the Board to consider the long-term implications for both the PWS fishery and the broader Alaskan economy, and to reject these proposals in favor of continuing the sustainable management practices that have proven successful in this region.

Sincerely,
Per Hesberg
Captain, F/V *Vanguard*

A handwritten signature in black ink, appearing to read "P Hesberg". The signature is written in a cursive, flowing style with a large initial "P" and a long, sweeping underline.

Submitted by: Christopher Hinkley

Community of Residence: Juneau

Comment:

I strongly oppose proposal 51. Cordova is a community built around the commercial fishing industry and this should be the main priority. Fishing time is already substantially limited during early season in order to protect the runs and further limitations would have dire results for fisherman. This proposal is purely for tourism, which makes up a tiny percentage of the income of the community.

Submitted by: Gary Hinzman

Community of Residence: Fairbanks

Comment:

The top priority for Alaska's fish harvest should be for the residents to feed their families, NOT for commercial fishers to have a stranglehold on the resource.

I oppose proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66,67,68,69,71.

I support proposals 48,51,52,53,58,59,70.

Thank you for this opportunity to share my thoughts and thank you for serving on the board.

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 fished off and on for about 12 years.
Mostly the flats

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Tom Hlavnicka

A solid black rectangular box used to redact the signature of Tom Hlavnicka.

Hoonah

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 1, 25, and 26 - OPPOSE

-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.

-Establish a personal use sablefish fishery in Prince William Sound.

-Establish a Prince William Sound groundfish personal use fishery.

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

SUPPORT this proposal with CDFU

Proposal 2 - SUPPORT

Reopen waters closed to the harvest of groundfish in Prince William Sound

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

SUPPORT this proposal with CDFU

Proposal 3 - SUPPORT

Modify Prince William Sound groundfish pot specifications

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

OPPOSE this proposal with CDFU**Proposal 5 - OPPOSE**

Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

SUPPORT this proposal with CDFU**Proposal 6 - SUPPORT**

Allow for release of rockfish in mechanical jig and hand troll fisheries.

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

OPPOSE this proposal with CDFU**Proposal 7 - OPPOSE**

Establish gear specifications for directed lingcod fisheries in Prince William Sound.

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

SUPPORT this proposal with CDFU

Proposal 8 - SUPPORT

Modify the Prince William Sound pacific cod fishery guideline harvest level.

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

SUPPORT this proposal with CDFU

Proposal 9 - SUPPORT

Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

SUPPORT this proposal with CDFU

Proposal 10 - SUPPORT

Modify pot limit in the Prince William Sound Pacific cod fishery.

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.

Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

SUPPORT this proposal with CDFU

Proposal 13 - SUPPORT

Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

Proposal 19 - SUPPORT

Modify the commercial fishing season for sablefish in Prince William Sound.

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

SUPPORT this proposal with CDFU

Proposal 20 - SUPPORT

Modify the commercial fishing season for sablefish in Prince William Sound.

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

SUPPORT this proposal with CDFU

Proposal 22- SUPPORT

Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

SUPPORT this proposal with CDFU

Proposal 23 - SUPPORT

Prohibit the retention of sablefish from state waters.

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

SUPPORT this proposal with CDFU

Proposal 27 - SUPPORT

Modify rockfish bag and possession limits.

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

OPPOSE this proposal with CDFU

Proposal 28 - OPPOSE

Modify the rockfish area, bag and possession limit.

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

Proposal 29 - SUPPORT

Create additional provisions for yelloweye rockfish management.

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.

-Require in season reporting in subsistence and personal use fisheries.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

OPPOSE this proposal with CDFU

Proposal 48 - OPPOSE

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

SUPPORT this proposal with CDFU**Proposal 49 - SUPPORT**

Prohibit transport services in the Glennallen Subdistrict.

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

OPPOSE this proposal with CDFU**OPPOSE this proposal with CDFU****OPPOSE this proposal with CDFU****Proposals 51, 52, 53 - OPPOSE**

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU

Proposal 55 - SUPPORT

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

OPPOSE this proposal with CDFU

Proposal 58 - OPPOSE

Amend the Copper River King Salmon Management Plan.

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

OPPOSE this proposal with CDFU

Proposal 59 - OPPOSE

Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 60, 61 - SUPPORT

-Modify the annual limit for the Chitina Subdistrict.

-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

SUPPORT this proposal with CDFU

Proposal 62 - SUPPORT

Allow inseason adjustment of the Copper River personal use maximum harvest level.

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

OPPOSE this proposal with CDFU**Proposal 63 - OPPOSE**

Amend the opening date of the Chitina Subdistrict personal use fishery.

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU**Proposal 64 - SUPPORT**

Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

SUPPORT this proposal with CDFU**Proposal 65 - SUPPORT**

Require a weekly permit and inseason reporting in the Chitina Subdistrict.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

SUPPORT this proposal with CDFU

Proposal 66 - SUPPORT

Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

SUPPORT this proposal with CDFU

Proposal 67 - SUPPORT

Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 68, 69 - SUPPORT

-Prohibit dipnetting from a boat in the Chitina Subdistrict.

-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

OPPOSE this proposal with CDFU**Proposal 70 - OPPOSE**

Extend the lower boundary of the Chitina Subdistrict.

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

SUPPORT this proposal with CDFU**Proposal 71 - SUPPORT**

Prohibit guiding in the Chitina Subdistrict.

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

SUPPORT this proposal with CDFU**Proposal 72 - SUPPORT**

Close sport fishing for salmon based on water temperature in the Gulkana River.

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

OPPOSE this proposal with CDFU**Proposal 78 - OPPOSE**

Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

SUPPORT this proposal with CDFU

Proposal 79 - SUPPORT

Close Main Bay to all fishing during hatchery cost recovery operations.

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive

access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

SUPPORT this proposal with CDFU

Proposal 80 - SUPPORT

-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal. Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

OPPOSE this proposal with CDFU

Proposal 83 - OPPOSE

Allow a resident sport angler to use two rods when fishing for salmon.

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

Modify the sport fishing area and season dates in Ibeck Creek.

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

Modify the sport fishing area and season in a Copper River Delta system.

We firmly support protections for spawning coho salmon in the Copper River Delta.

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly

restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

Submitted by: Nicholas Hodges

Community of Residence: Fairbanks

Comment:

My comments are located in the PDF.

In Short - I am in FAVOR of any and all BANNING of trawling and REDUCING BYCATCH as best we can to further ensure fishing opportunities in the future.

ADFG Proposal Comments:

Short Version: PROPOSALS 14/15/16/17 - YES, 46/47/49 - Possibly, 50 - YES, 51- Possibly, 52 - YES, 53 - Confused, 54 - NO, 58 - NO, 60/61 - NO, 62 - possibly, 63 - Possibly, 64 - YES, 65 - YES, 66 - Possibly, 67 - NO, 68/69/70/71/72 - Possibly, 76/77- possibly, 78- Yes, 83 - NO, 84 - YES, 85 - NO,

GROUND FISH:

Proposal 14: YES

Reducing/eliminating Pollock Pelagic trawling in PWS waters, in my opinion, drastically increase the number of Chinook and other salmon species, halibut, and rockfish available for other (non trawling) commercial and sport fishing use. There has been way too much bycatch recently with gear that should not be touching the ground but is. While not law, even having the nets be a few feet off the ground is *essentially* draggin the bottom of the ocean floor. Kicking up the ocean floor also destabilizes the ecosystem further and drastically reduces the viability of these parts of the ocean floor that can recover and continue to contribute to our Alaska fisheries. Us Alaskans rely on salmon particularly chinook salmon to provide for our families and communities and many of these Trawlers' employees are not even from Alaska - thus not even contributing to what I believe is called our cyclical economy.

Proposal 15: YES

Continuing to reduce bycatch will help to drastically increase the number of Chinook and other salmon species, halibut, and rockfish available for other (non trawling) commercial and sport fishing use. There has been way too much bycatch recently, specifically chinook bycatch. Capping the number regardless of GHL increases ensures good years are not taken away by increased bycatch.

Proposal 16: YES

Continuing to reduce bycatch will help to drastically increase the number of Chinook and other salmon species, halibut, and rockfish available for other (non trawling) commercial and sport fishing use. There is good research out there that Shortraker rockfish are being targeted not on purpose but through the use of gear and methods being used to trawl.

Proposal 17: YES

If there is one thing I have learned about businesses, it is that without proper regulation/oversight companies can and will cut corners to maximize profits. Thus, it is a no brainer that all trawlers across Alaska, and especially in PWS should be required to have some sort of unbiased observation on site, at all times, for all means of trawling to ensure the CORRECT number of bycatch is being reported. If this proposal is correct and 0% is being observed there has to be some sort of remedy to correct this.

Copper River Salmon

Proposal 46 - Possibly

This seems more feasible, 7 days to report harvest.

Proposal 47 - Possibly

Maybe increase to 1-2 weeks. As it stands we do not have to submit until October so it is nice to have at least a little time to report. Maybe if that was adopted we could begin to reduce it to shorter time periods until report is due.

Proposal 49 - Possibly

It does seem weird to have to pay for a subsistence fishery but boat fuel is not cheap.

Proposal 50 - YES

Rivers are only so wide, this is not the ocean. Hot Spots will become more popular because of the use of chartplotters or fish finders.

Proposal 51 - possibly

We should be doing a better job at getting our fish to be more genetically diverse and this can be a helpful way to achieve this goal

Proposal 52 - YES

We should be allowing for better genetics in our early fish as those are the most likely targeted by commercial fishing. This results in uneven stocks, especially our early runs of fish.

Proposal 53 - CONFUSED

We should be ensuring that the early chinook/sockeye are making their way upstream into the furthest upstream tributaries.

Proposal 54 - NO

If you want your fisheries you should be attacking the trawlers and not the sport fisheries.

Proposal 58 - NO

We need as many kings getting upstream even on great years. Let's not do what Russia did pre Covid and increase their limits. I know WE can reduce them but the limits are good as is. Go fish MORE!

Proposal 60/61 - NO

Especially with Valdez shutting down silvers this early fishery really saved my bacon in regards to harvesting the appropriate amount of fish needed to feed me and my family through the winter.

Proposal 62 - Possibly

More research but we are out of time with our ability to make good and lasting changes to these fisheries. Allowing for this could be a last ditch effort to save these fisheries, but is of my opinion that if we do this we are really just helping trawlers acquire more fish as they will continue to pillage our ocean floors

Proposal 63 - Possibly

Am in favor of allowing for change in opening dates if this allows for better genetic variations in and through the copper river basin improving the brood stock.

Proposal 64 - YES

Those that fish the cook inlet personal use fisheries should not be allowed to fish in the Copper River Personal Use Fishery.

Proposal 65: Yes

Would not be very challenging to report on a weekly basis unless you are fishing multiple days in a row during the required change. Maybe making it 1 week after the personal harvest would make it more fair so everyone gets minimum of 7 days in order to report their harvest.

Proposal 66: possibly

This could help achieve hatchery goals but limit the sport fisherman while not addressing things such as commercial trawling.

Proposal 67: NO?

Is this not already law? It is already very challenging to be rock climbing, harnessed, and get a king of the net while keeping the net in the water. This would be easier to do off of a boat.

Proposal 68/69: Possibly

Power boats are a major disadvantage of dip netting especially for those locals without a boat. Further restrictions could really help level the playing/fishing field.

Proposal 70 - Possibly

As a rock climber I already feel like the charters have it easy and allowing an increase in the line of fishing could severely hurt the rock climbing dip netting community.

Proposal 71 - Possibly

I think charters like Hems are good for those who cannot hike down/climb rocks but the price of these charters is astronomically high. I have heard rumors of non-res fishing off of charters but have NO proof of this. I do know non-res have fished off the rocks but from others have heard the charters do a good job ensuring only res dip net in the Copper.

Proposal 72: Possibly

This seems interesting and has good science behind this. While I think more research should be done we are kind of out of time to do more research. This may be a good way to help limit the stress and strain on river fishing for King Salmon.

Prince William Sound and Upper Copper and Upper Susitna Rivers Sport

Proposal 83: NO

There would be less opportunities for those that are unable to secure fishing on a boat.

Proposal 84: YES

Charters continue to increase in number. They should not be allowed to fish while working. It seems weird but maybe not - coming from a sport fisherman not a charter fisherman.

Proposal 85: NO

There was already not enough of a silver salmon return to support the hatchery causing a complete closure of Silvers in Port Valdez. This seems silly to try and pass on a lean year. Maybe on a big/good year this could sound more appealing. This is coming from a BIG sport fisherman in the Port of Valdez.

COMMERCIAL FISHING PERMITS, ALLOCATION PLAN AND HATCHERY OPERATIONS (9 PROPOSALS)

I don't fully understand Proposal 76 & 77. I would be in favor of if it how I read is this: There would NOT be a increase in Pink intake via hatchery/commercial fishing as I believe there are already too many pink fish/hatcheries as is.

Proposal 78 YES

Reducing the pink hatchery is one way we can get away from many locals talking about trawling and instead take a look at what hatcheries can do for the genetic makeup of the PWS salmon. Especially on a year like 2024 where there was a large reduction in both Pink and Silver Salmon return this year.

PROPOSALS 14/15/16/17 - YES, 46/47/49 - Possibly, 50 - YES, 51- Possibly, 52 - YES, 53 - Confused, 54 - NO, 58 - NO, 60/61 - NO, 62 - possibly, 63 - Possibly, 64 - YES, 65 - YES, 66 - Possibly, 67 - NO, 68/69/70/71/72 - Possibly, 76/77- possibly, 78- Yes, 83 - NO, 84 - YES, 85 - NO,

Nicholas Hodges

**BOF Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Meeting
December 10 - 16, 2024**

Jacki Holzman



Anchorage, AK 99502

Proposal 45 oppose

Allowing subsistence fishing in closure areas while not allowing personal use is discriminatory to other users attempting to procure fish. The rationale given in the proposal is that it is okay for subsistence users because they are limited to five King salmon per household. Using that same rationale, personal use fishers should be allowed the same access since they are limited to only one King salmon per year.

Proposal 48 support

This allows access to the fishery for those who do not have the privilege of access to the shore or own a boat.

Proposal 49 oppose

This proposal unduly restricts those for outside the area from access to the fishery. If this is passed then subsistence users in all other harvest areas of the state should also be restricted to hunting/fishing only in the specific geographical area where they live. This proposal is discriminatory.

Proposal 50 oppose

Depth finders, chart plotters, etc. are generally all packed in the same unit. They are safety gear that allows boaters to more safely navigate. If a decision is made to restrict them in this fishery, it makes sense also to prohibit them in all other fisheries. The escapement goals will not be helped by implementing this proposal and it is unnecessary and will increase the risk of accidents and damage to boats on the river.

Proposal 55 oppose

This ostensibly promotes “shared conservation” between upriver and down river commercial fishing. It does not. The author conflates commercial fishing with guide services and wants to shut down guides when the commercial fleet has restrictions while saying the rationale is based on coordination with others and historical data, though no data is presented. The facts are that the commercial fishery landed over 1.3 million reds and 8,200 kings last year compared to the

personal use fishery taking 160,000 reds and 200 kings. This proposal does not increase King escapement.

Proposal 58 support

This will better allow the department to manage the escapement goals on both ends of the escapement range.

Proposal 60 oppose

This puts an undue restriction on personal use households. Personal use represents less than 10% of the commercial harvest and who knows how little of the subsistence catch. This proposal requests a 20% reduction of the personal use limit to address a 9% “over catch” issue that is most likely not recurring. This puts an undue hardship on personal use households as opposed to spreading the pain over all users.

Proposal 61 oppose

This will work a hardship on a vast number of personal use households for no appreciable gain in increasing escapement goals. This will essentially limit head of household limits until later in the season. Those who fish early in the season will need to make two trips instead of one. In one of the earlier proposals, it was stated that it didn’t matter when subsistence users caught their fish because they were limited to 5 kings. The rationale for both personal and subsistence should be the same. It doesn’t matter when the fish are caught, the limit is the limit and this proposal will have no discernible effect on overall escapement.

Proposal 62 oppose

This is unfairly punitive to the personal use fishery. In reality any impact of the personal use fishery is negligible compared to the subsistence and commercial catch. While I can appreciate the challenges faced by the commercial fishing interests, it makes no sense to hamstring personal use households when the harvest is less than 10% of the commercial fleet’s harvest. And who knows what a small percentage of the subsistence users’ harvest.

Proposal 65 oppose

Proposal 47 addresses this. It is not a good idea. Restricting permits to one week accomplishes nothing for the fishery. It makes it more work for personal use households to plan and complete their fishing trips. If something delays their trip they need a new permit. The earlier proposals regarding in season reporting can be accomplished without this proposal.

Proposition 68 oppose

This proposal will make personal use fishing more dangerous. Unlike the Kenai and Kasilof rivers the Copper River does not have long sandy beaches at the locations favorable for dip netting, many of them are along cliffs and rocky edges of the river. The adverse impacts of this proposal would overwhelmingly be experienced by seniors and those with physical impairments. This is unfair and discriminatory.

Proposition 69 oppose

Establishing more restrictions on dip netting from boats is unnecessary. Ultimately, escapement goals are what matters (It is ironic that the author of this proposal earlier proposed ways to make the commercial fleet more efficient in catching fish and another author of a proposal asking for permit stacking has the same name). This proposal calls for a restriction on dip netting practices with no apparent connection to, or impact on, sustainability of the fishery.

Proposal 70 support

This proposal will increase the safety of the fishery. Opening this area to dip netting will relieve congestion on the river during times that many users are present and will reduce the chances for collisions, injuries, and potential loss of life due to accidents.

Submitted by: James Honkola

Community of Residence: Cordova, AK

Comment:

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I respectfully ask you to consider my proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting. I am an Area E commercial fishermen. I am a 3rd generation Area E commercial fisherman, born and raised in Cordova, Alaska. I have crewed in drift gill net and purse seine fisheries since 12 years old with my family. I bought my own drift permit and vessel in 2012 after graduating college in 2010 with a BS in civil engineering. During last 3 years I have also captained a seine vessel in Prince William Sound. As a father of 4 I remain dedicated to supporting this local fishing community and using sound science to manage our fisheries to benefit all users groups for generations to come.

James Honkola

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am a 3rd generation Area E commercial fisherman, born and raised in Cordova, Alaska. I have crewed in drift gill net and purse seine fisheries since I was 12 with my family. I bought my own drift permit and vessel in 2012 after graduating college in 2010 with a BS in civil engineering. During the last 3 years I have also captained a seine vessel in Prince William Sound. As a father of 4 I remain dedicated to supporting this local fishing community and using sound science to manage our fisheries to benefit all user groups for generations to come.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

James Honkola

A solid black rectangular box used to redact the signature of James Honkola.

Cordova

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.: SUPPORT this proposal with CDFU

Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.: SUPPORT this proposal with CDFU

Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 23 - Prohibit the retention of sablefish from state waters.: SUPPORT this proposal with CDFU

Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.: OPPOSE this proposal with CDFU

Proposal 27 - Modify rockfish bag and possession limits.: SUPPORT this proposal with CDFU

Proposal 28 - Modify the rockfish area, bag and possession limit.: OPPOSE this proposal with CDFU

Proposal 29 - Create additional provisions for yelloweye rockfish management.: SUPPORT this proposal with CDFU

Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.: SUPPORT this proposal with CDFU

Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.: OPPOSE this proposal with CDFU

Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.: SUPPORT this proposal with CDFU

Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.: SUPPORT this proposal with CDFU

Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.: SUPPORT this proposal with CDFU

Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 43 - Establish a directed octopus fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.: SUPPORT this proposal with CDFU

Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.: SUPPORT this proposal with CDFU

Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.: OPPOSE this proposal with CDFU

Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.: SUPPORT this proposal with CDFU

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.: OPPOSE this proposal with CDFU

Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.: SUPPORT this proposal with CDFU

Proposal 58 - Amend the Copper River King Salmon Management Plan.: OPPOSE this proposal with CDFU

Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.: OPPOSE this proposal with CDFU

Proposal 60 - Modify the annual limit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.: SUPPORT this proposal with CDFU

Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.: OPPOSE this proposal with CDFU

Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.: SUPPORT this proposal with CDFU

Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.: SUPPORT this proposal with CDFU

Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.: OPPOSE this proposal with CDFU

Proposal 71 - Prohibit guiding in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.: SUPPORT this proposal with CDFU

Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.: OPPOSE this proposal with CDFU

Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.: SUPPORT this proposal with CDFU

Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.: SUPPORT this proposal with CDFU

Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.: SUPPORT this proposal with CDFU

Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.: OPPOSE this proposal with CDFU

Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.: SUPPORT this proposal with CDFU

Proposal 85 - Modify the bag and possession limit for coho salmon.: OPPOSE this proposal with CDFU

Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.: SUPPORT this proposal with CDFU

Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.: SUPPORT this proposal with CDFU

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.: SUPPORT this proposal with CDFU

Proposal 97 - Reduce the minimum herring spawning biomass threshold.: SUPPORT this proposal with CDFU

Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.: SUPPORT this proposal with CDFU

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fishermen. I grew up fishing commercially with my dad in Area E and then bought into gillnetting in 2014. I serve on the CDFU board, the PWSAC board, NVE's natural resource committee, and ASMI's salmon committee.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Hayley Hoover

[REDACTED]

Cordova/Anchorage

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 1, 25, and 26 - OPPOSE

-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.

-Establish a personal use sablefish fishery in Prince William Sound.

-Establish a Prince William Sound groundfish personal use fishery.

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

SUPPORT this proposal with CDFU

Proposal 2 - SUPPORT

Reopen waters closed to the harvest of groundfish in Prince William Sound

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

SUPPORT this proposal with CDFU

Proposal 3 - SUPPORT

Modify Prince William Sound groundfish pot specifications

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

OPPOSE this proposal with CDFU**Proposal 5 - OPPOSE**

Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

SUPPORT this proposal with CDFU**Proposal 6 - SUPPORT**

Allow for release of rockfish in mechanical jig and hand troll fisheries.

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

OPPOSE this proposal with CDFU**Proposal 7 - OPPOSE**

Establish gear specifications for directed lingcod fisheries in Prince William Sound.

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

SUPPORT this proposal with CDFU

Proposal 8 - SUPPORT

Modify the Prince William Sound pacific cod fishery guideline harvest level.

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

SUPPORT this proposal with CDFU

Proposal 9 - SUPPORT

Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

SUPPORT this proposal with CDFU

Proposal 10 - SUPPORT

Modify pot limit in the Prince William Sound Pacific cod fishery.

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.

Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

SUPPORT this proposal with CDFU

Proposal 13 - SUPPORT

Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

SUPPORT this proposal with CDFU

Proposal 19 - SUPPORT

Modify the commercial fishing season for sablefish in Prince William Sound.

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

SUPPORT this proposal with CDFU

Proposal 20 - SUPPORT

Modify the commercial fishing season for sablefish in Prince William Sound.

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

SUPPORT this proposal with CDFU

Proposal 22- SUPPORT

Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

SUPPORT this proposal with CDFU

Proposal 23 - SUPPORT

Prohibit the retention of sablefish from state waters.

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

SUPPORT this proposal with CDFU

Proposal 27 - SUPPORT

Modify rockfish bag and possession limits.

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

OPPOSE this proposal with CDFU

Proposal 28 - OPPOSE

Modify the rockfish area, bag and possession limit.

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

Proposal 29 - SUPPORT

Create additional provisions for yelloweye rockfish management.

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

SUPPORT this proposal with CDFU

Proposal 31 - SUPPORT

Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

SUPPORT this proposal with CDFU

Proposal 32 - SUPPORT

Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING

SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

OPPOSE this proposal with CDFU

Proposal 33 - OPPOSE

Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

SUPPORT this proposal with CDFU

Proposal 34 - SUPPORT

Repeal the Registration Area E Tanner crab harvest strategy.

The current Area E Tanner crab harvest strategy is unworkable, as it relies too heavily on trawl surveys and does not allow for a fishery in the majority of the PWS area. At the 2021 meeting the Area E Tanner crab harvest strategy was passed as a placeholder that allowed for a small fishery in 2022. ADFG assured fishermen that a more holistic Tanner crab harvest strategy was forthcoming, and would be presented for the 2024 meeting.

CDFU encouraged fishermen to participate in the Tanner crab test fisheries over 4 years because the ADFG stated that they needed this data to create a harvest strategy for PWS. Instead, ADFG gave us a harvest strategy which did not use any test fishery data. This created no possibility of opening some of the best fishing grounds found in the test fisheries.

SUPPORT this proposal with CDFU

Proposal 35 - SUPPORT

Modify the harvest strategy for Prince William Sound Tanner crab.

At the 2021 BOF meeting, ADFG and fishermen worked together at the last minute to create a flawed PWS Tanner crab management plan. The BOF, ADFG and CDFU expressed interest in working together to create a more workable plan before the 2024 BOF meeting.

CDFU reached out to ADFG multiple times in the last year to collaborate on proposals related to PWS Tanner crab but received extremely limited input. Proposal 35 is our best attempt to create a workable harvest strategy for PWS Tanner crab that will result in a sustainable fishery.

SUPPORT this proposal with CDFU

Proposal 36 - SUPPORT

Increase the pot limit in the Prince William Sound Tanner crab fishery.

At the 2017 BOF meeting the pot limit was reduced from 75 pots to 30 pots. This was part of a large proposal by the ADFG to establish a new harvest strategy for PWS Tanner crab. No justification for the reduction was given by ADFG in their proposal or in ADFG staff comments. There was not public support for the reduction.

Pot limits should be set with input from the fleet. The pot limit reduction passed as part of a total rewrite of the Tanner crab management strategy. That harvest strategy was flawed in many ways, and working through that distracted from input on the pot reduction section.

Higher pot limits reduce handling of immature and female crabs because it increases soak times. This allows time for small crab to leave the pot via the escape rings. As we have in many different areas and other fisheries, Fishermen will ask the BOF to lower the pot limit if fishery participation increases and crowding becomes an issue from too many pots.

The small pot limit makes prospecting PWS exceptionally time consuming and expensive. Since the fishery reopened, there is a large portion of PWS, especially the outside waters, that have not been explored. Tanner crabs move in schools. They are easily missed when too few pots are spread over too large an area. This pot limit is damaging to the resource because it increases the handling of undersized crab. It also is economically damaging to fishery participants because it increases the bait, fuel, and time required to execute the fishery.

SUPPORT this proposal with CDFU

Proposal 37 - SUPPORT

Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.

ADFG does not need the ability to adjust pot limits to manage the fishery. For instance, the length of salmon seines isn't adjusted from season to season based on run size. The daily reporting requirement in regulation allows ADFG to closely monitor the pace of the fishery and close it when there is a danger of exceeding the GHL. There is no regulation allowing adjustment to pot limits by ADFG for Southeast or Kodiak, instead static pot limits are set by the BOF. In 2022 ADFG utilized this regulation to lower the pot limit to 25. This was a significant reason the fleet was unable to harvest the GHL that season.

SUPPORT this proposal with CDFU

Proposal 38 - SUPPORT

Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries.

SUPPORT this proposal with CDFU

Proposal 39 - SUPPORT

Establish season dates for a commercial Golden King crab fishery.

Southeast Alaska has a booming Golden King crab fishery without a fishery independent assessment.

“The Alaska Department of Fish and Game (department) evaluates stock status and establishes guideline harvest levels (GHLs) for each management area using fishery dependent data including: catch per unit of effort (CPUE), harvest and biological information (carapace length, weight, and maturity) from dockside sampling landings. No population abundance estimates are obtained for GKC stocks.” -from the Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season

Our fishermen have seen ample evidence of Golden King crab abundance. ADFG has no assessment for Golden King crab in PWS and to date has stated no intention of developing the harvest strategy current regulation stipulates. It seems that this fishery will stay closed forever without action by the BOF.

SUPPORT this proposal with CDFU

Proposal 40 - SUPPORT

Adopt a harvest strategy for golden king crab in Prince William Sound.

Golden King crab fisheries must depend on CPUE in the commercial fishery to set its GHL, because there is no good way to survey. This proposed harvest strategy is similar to the one being used with success in Southeast.

As the fishery develops and distinct populations of Golden King crab are discovered, it will be prudent to break the area into districts. In the meantime, the statistical areas that are already in regulation allow for a reasonable starting point until the next BOF meeting cycle.

Local PWS economies are struggling following years of depressed fish prices, increased overhead costs for operations, and increased efforts of time for static harvests. It is imperative that the BOF direct ADFG to open these small scale fisheries, because they are simply not being proactively opened without BOF direction.

OPPOSE this proposal with CDFU

Proposal 42 - OPPOSE

Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.

Crab fisheries close during the summer months because this is when crab are molting and most susceptible to mortality from handling.

We oppose the opening of a sport fishery for King or Tanner crab without also opening a commercial fishery.

Proposal 43 - SUPPORT

Establish a directed octopus fishery in Prince William Sound.

In recent years the GHL for PWS octopus has not been harvested but fishermen are interested in an octopus fishery.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.

-Require in season reporting in subsistence and personal use fisheries.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

OPPOSE this proposal with CDFU

Proposal 48 - OPPOSE

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence

fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

SUPPORT this proposal with CDFU

Proposal 49 - SUPPORT

Prohibit transport services in the Glennallen Subdistrict.

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 51, 52, 53 - OPPOSE

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of

695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU

Proposal 55 - SUPPORT

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

Proposals 56 + 57 – OPPOSE

-Allow permit stacking by Prince William Sound commercial salmon drift gillnet permit holders

-Allow dual permit operations in the Prince William sound commercial drift gillnet salmon fishery

Contrary to the authors' statements on opportunity, this will further limit access to this fishery and make it more difficult for new entrants to obtain permits and participate if a single permit holder can hold two permits. At least initially, there will not be less gear in the water. Instead, the dormant or low effort permits will be sold to the most productive fishermen running the largest, most efficient vessels. There will be more gear in the water and more significantly, the most productive boats in the fishery will have more gear to fish. This could have a drastic effect on the harvests of other drift permit holders that only fish one permit and could have a significant effect on the harvest levels of setnet permit holders.

OPPOSE this proposal with CDFU

Proposal 58 - OPPOSE

Amend the Copper River King Salmon Management Plan.

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed

manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

OPPOSE this proposal with CDFU

Proposal 59 - OPPOSE

Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 60, 61 - SUPPORT

-Modify the annual limit for the Chitina Subdistrict.

-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

SUPPORT this proposal with CDFU

Proposal 62 - SUPPORT

Allow inseason adjustment of the Copper River personal use maximum harvest level.

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

OPPOSE this proposal with CDFU

Proposal 63 - OPPOSE

Amend the opening date of the Chitina Subdistrict personal use fishery.

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU

Proposal 64 - SUPPORT

Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

SUPPORT this proposal with CDFU

Proposal 65 - SUPPORT

Require a weekly permit and inseason reporting in the Chitina Subdistrict.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

SUPPORT this proposal with CDFU

Proposal 66 - SUPPORT

Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

SUPPORT this proposal with CDFU

Proposal 67 - SUPPORT

Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 68, 69 - SUPPORT

-Prohibit dipnetting from a boat in the Chitina Subdistrict.

-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased

commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

OPPOSE this proposal with CDFU

Proposal 70 - OPPOSE

Extend the lower boundary of the Chitina Subdistrict.

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

SUPPORT this proposal with CDFU

Proposal 71 - SUPPORT

Prohibit guiding in the Chitina Subdistrict.

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

SUPPORT this proposal with CDFU

Proposal 72 - SUPPORT

Close sport fishing for salmon based on water temperature in the Gulkana River.

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

OPPOSE this proposal with CDFU

Proposal 78 - OPPOSE

Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

SUPPORT this proposal with CDFU

Proposal 79 - SUPPORT

Close Main Bay to all fishing during hatchery cost recovery operations.

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

SUPPORT this proposal with CDFU

Proposal 80 - SUPPORT

-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal. Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

SUPPORT this proposal with CDFU

Proposal 81 - SUPPORT

Modify the area open to sport fishing near the Main Bay Hatchery.

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

OPPOSE this proposal with CDFU

Proposal 83 - OPPOSE

Allow a resident sport angler to use two rods when fishing for salmon.

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

Modify the sport fishing area and season dates in Ibeck Creek.

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

Modify the sport fishing area and season in a Copper River Delta system.

We firmly support protections for spawning coho salmon in the Copper River Delta.

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

SUPPORT this proposal with CDFU

Proposal 96 - SUPPORT

Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

SUPPORT this proposal with CDFU

Proposal 97 - SUPPORT

Reduce the minimum herring spawning biomass threshold.

Biomass thresholds are normally set based on a population's unfished size. There are now 30 years of population estimates where no fishery occurred. This data should be used to set fishery limits and exploitation rates.

The PWS and Gulf of Alaska ecosystems have changed drastically in the last 30-50 years, and will continue to change. There is no reason to keep the herring fishery closed until it achieves those historical population numbers. Environments are ever-changing and managers need to have an ability to adapt to outdated management strategies.

SUPPORT this proposal with CDFU

Proposal 98 - SUPPORT

Align Prince William Sound herring and salmon management area descriptions.

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

Proposal 99 - SUPPORT

Define commercial herring fishery districts in Prince William Sound.

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

SUPPORT this proposal with CDFU

Proposal 100 - SUPPORT

Adopt a Kayak Island District herring management plan.

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

Proposal 102 - SUPPORT

Allow commercial fishery permit holders to harvest herring for the own use as bait.

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fishermen. I've fished Prince William Sound for 28 years. From 1997-2007 I seined and long-lined. From 2008 to now I have tendered for salmon in Area E and long-lined.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Chris Hottinger

[REDACTED]

Cordova, Alaska

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.: SUPPORT this proposal with CDFU

Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.: SUPPORT this proposal with CDFU

Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 23 - Prohibit the retention of sablefish from state waters.: SUPPORT this proposal with CDFU

Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.: OPPOSE this proposal with CDFU

Proposal 27 - Modify rockfish bag and possession limits.: SUPPORT this proposal with CDFU

Proposal 28 - Modify the rockfish area, bag and possession limit.: OPPOSE this proposal with CDFU

Proposal 29 - Create additional provisions for yelloweye rockfish management.: SUPPORT this proposal with CDFU

Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.: SUPPORT this proposal with CDFU

Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.: OPPOSE this proposal with CDFU

Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.: SUPPORT this proposal with CDFU

Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.: SUPPORT this proposal with CDFU

Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.: SUPPORT this proposal with CDFU

Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 43 - Establish a directed octopus fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.: SUPPORT this proposal with CDFU

Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.: SUPPORT this proposal with CDFU

Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.: OPPOSE this proposal with CDFU

Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.: SUPPORT this proposal with CDFU

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.: OPPOSE this proposal with CDFU

Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.: SUPPORT this proposal with CDFU

Proposal 58 - Amend the Copper River King Salmon Management Plan.: OPPOSE this proposal with CDFU

Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.: OPPOSE this proposal with CDFU

Proposal 60 - Modify the annual limit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.: SUPPORT this proposal with CDFU

Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.: OPPOSE this proposal with CDFU

Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.: SUPPORT this proposal with CDFU

Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.: SUPPORT this proposal with CDFU

Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.: OPPOSE this proposal with CDFU

Proposal 71 - Prohibit guiding in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.: SUPPORT this proposal with CDFU

Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.: OPPOSE this proposal with CDFU

Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.: SUPPORT this proposal with CDFU

Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.: SUPPORT this proposal with CDFU

Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.: SUPPORT this proposal with CDFU

Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.: OPPOSE this proposal with CDFU

Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.: SUPPORT this proposal with CDFU

Proposal 85 - Modify the bag and possession limit for coho salmon.: OPPOSE this proposal with CDFU

Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.: SUPPORT this proposal with CDFU

Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.: SUPPORT this proposal with CDFU

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.: SUPPORT this proposal with CDFU

Proposal 97 - Reduce the minimum herring spawning biomass threshold.: SUPPORT this proposal with CDFU

Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.:

SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.: SUPPORT this proposal with CDFU

Submitted by: Anita Howard

Community of Residence: Lake Louise

Comment:

I do not believe that increasing the limit on burbot on Lake Louise is in the best interest of the fish or the fisherman. This population was badly depleted in I believe the 70s and has never truly recovered. LL is too easy to access in winter especially and with all the newer technology, the chances are, the population will plummet.

Submitted by: Edmund Howell

Community of Residence: Highland, Utah

Comment:

Comments related to proposals 86, 87, and 88. I am against proposal 86. I am against proposal 87. I am against proposal 88. My opposition is detailed in the attached PDF document. I have also included some general comments for the Board's consideration relating to sportfishing in the Cordova area. Please see attached.

**Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526**

RE: Comments concerning Proposals 86, 87, and 88 by the 2024 meeting of the Alaska Board of Fisheries for the Prince William Sound and Upper Copper River and Upper Susitna River

Proposal 86 – Against

Proposal 87 – Against

Proposal 88 - Against

General Comments and Suggestions relating to Sportfishing in the Cordova Area

My wife and I have traveled to Cordova every year, for the past ten years, to fish for silver salmon. I started fishing in Cordova in 2004. I would like to share my concerns about the management practices that are currently in place as well as those that are being proposed for 2025 and beyond. My experiences are anecdotal, because everyone's experiences differ, based on fish migration patterns, expertise and just plain luck, but nevertheless, our many years of sportfishing in the area has given us some degree of local knowledge. Though not every year has been abundant with catchable fish, 2024 was the worst year in our history of fishing in the Cordova area.

In 2024, we fished from September 16th to September 21st. We fished at least seven hours each of those six days, but only harvested total of five fish each. Of those, three each were harvested on Monday the 16th. I did not harvest a single fish on Tuesday, Wednesday, Thursday or Saturday. We fished multiple locations including some more remote locations that involved some hiking and travel. Most of our fishing was done downstream from the Copper River Highway and included the Eyak River, Ibeck Creek, Alaganik Slough, as well as other small tributaries.

We are accustomed to and recognize that there are factors that impact fishing. Run timing, river flow rate, water clarity and other weather conditions all influence the ability to catch fish. These are things that cannot be controlled. We have also become accustomed to the impact that commercial openers have on sport fishing in the area. We have learned that the day or two after a commercial opener will be difficult on the main waterways, because most of the fish that we catch are moving, migrating fish. On the days following openers, we find our best success higher upriver where the fish are less transient and are resting or migrating to spawn. We fish in these areas much less when fish are entering the rivers and accessible below the highway.

It has been our experience that the commercial fishermen have become so efficient and expert that they harvest, on commercial openers, nearly all the available fish that are staging, near the mouth of main waterways, for their runs upriver. It typically takes a day or two, and some tides before the we find fish moving again. I don't fault the commercial fishermen, but they have become very good at maximizing their harvest, and their nets allow very few fish to escape.

In the week we were in Cordova on September, 2024, there were two 36-hour commercial openers in the week. One on Monday and Tuesday, and another on Thursday and Friday. Despite significant rain on Tuesday, the Eyak River and other areas, from a water clarity standpoint, remained fishable. There may have been other mitigating factors, but between the two commercial openers, there were very few fish entering the river system. Not only did we not catch fish, but we saw very few groups of fish. We avoided some of the alternative places to fish because these areas were more crowded than usual due to the lack of fish in the river areas below the Copper River Highway.

I would have discounted the effect that the commercial opener might have had on the sportfishing, and blamed it on other factors, but it was reported that commercial fishermen harvested over six thousand silver salmon from the Copper River Basin on the Monday, September 16th, 36 hour opener. With this harvest, there weren't many fish left for the sportfishermen. Then, just 36 hours later, there was another 36 hour opener. These openers, combined with other natural factors, made sportfishing very difficult.

In saying these things, I am not criticizing the commercial fishermen. They have a lot of expenses too, and they are just doing the best they can to make a living. But it is our observation that they have become very expert and efficient in capturing the bulk of the staging salmon as they prepare to move into the river systems, allowing very minimal escapement and fish to spawn.

This leads me to a few observations. Even though escapement quotas may have been achieved earlier in the season, two 36-hour openers in a single week, created an undue burden on sportfishermen. A weeklong trip for my wife and I cost between \$5,000 and \$6,000, plus food and gear. The run time for silver salmon, lasts just a few weeks, but during that time, sportsmen contribute a great deal to the local economy in taxes, lodging, meals, and charter fees. We would hope that there would be at least a reasonable opportunity to catch a few more fish since we save, prepare and look forward to this trip, all year. Sportfishermen catch a small percentage of the migrating fish, compared to commercial fishermen. Nets are more effective in capturing and blocking the bulk of the migration, than a few fishermen using lures or flies. Many fish, after entering the river systems, do get past sportfishermen, and continue to the spawning grounds.

The fact is that the commercial fishermen and the sportfishermen are fishing for the same potentially spawning fish. The commercial fishermen fish for them in salt water as they stage near the river mouths. The sportfishermen target fish as they enter and move up their freshwater streams. The commercial fishermen take thousands while the sportfishermen take approximately 7 percent or less. But, harvested fish are the same mature spawning fish regardless of who catches them or where they are caught. The biggest difference is that a much greater and more efficient harvest is done by those using nets. Net fishermen allow few fish to enter the fresh water and eventually spawn while the majority of fish who actually enter the fresh water, make it to the spawning beds even though they do have to run past fishermen using hooks.

I make the following suggestions relating to sportfishing in the Cordova Area:

1. Reconsider the closure of any additional sport fishing grounds in the Cordova area. Let the areas, that are not already closed, remain accessible to allow sportfishermen places to go when the main rivers, creeks and sloughs below the Copper River Highway are not fishable.

2. Increase the escapement targets for the Cordova area fisheries. This single action would affect both the commercial and the sport fishermen, but it would allow more naturally spawning fish to reach the areas upriver that are already protected.
3. Consider restrictions on where commercial fishermen could set nets to allow some escapement during commercial openers. The geographic structure around Cordova allow commercial fishermen to create an effective barrier to almost any fish entering the Eyak river system and other area streams during commercial openers. Egg island and the adjacent passage near the mouth of the Eyak river is one example of the geographic structures where fishermen almost completely block river access to potential spawning fish.
4. After September 15th, there are normally still many fish entering the rivers to spawn. Please organize the structure of commercial openers to allow for at least some consideration of sportfishermen and to allow for additional escapement to promote the future of both commercial and sportfishing opportunities.

Relating to Proposals #86 and #87:

(#86) It is my assertion, that the effect of sportfishing, on spawning fish numbers, in areas upstream from the Copper River Highway is minimal due to the number of anglers that can and will hike to many of these locations, but the closure of these areas is still very restrictive for those that are willing to make the extra effort. Only a few anglers hike the Ibeck beyond the first mile, anyway. Upper Ibeck Creek is already closed beyond the markers that are approximately 3 miles upriver from the Copper River Highway.

(#87) There are a few small areas above, but adjacent to the highway, that allow fishermen some success, but these are small and space is limited. The Upper Alaganik, including the 18 Mile Hike, is also one of the few places that can be fished when areas below the highway are not fishable.

(#86 and #87) Further closures of available fishing areas unfairly restrict places that individuals can fish in the Cordova area. The proposed closures for 2025 create additional crowding of popular accessible fishing areas and diminish the overall fishing experience for sportfishermen. With natural factors such as weather and stream conditions, coupled with competition with commercial fishermen, there are simply few places left for the sport fishermen to go at certain times, within the season, to attempt to legally catch or harvest silver salmon. Most of the areas upriver from the Copper River Highway, require more effort to fish, but these are the only areas available to fish when areas below the highway are unavailable or devoid of fish due to commercial openers, excessive high water, or glacial silt clouded stream and river conditions. The Eyak River, Alaganik, and Ibeck Creek are accessible and would be the chosen places to fish for many anglers but are inaccessible or ineffective places to fish when river conditions or commercial openers don't make fishing there effective.

Comments relating to Proposal #88:

I firmly believe in science and research as the basis for fish and game regulations. Therefore, it might make sense to consider the quantity of actual fish that would be removed from the area water system by sportfishermen, if this proposal were not enacted. This proposal should not be enacted as an emotional issue by commercial fishermen which in effect says, "if we (commercial fishermen) are going to be punished by the closure of commercial fishing, then the sportfishermen should be punished, as well." Bag limit reduction of a few hundred fish taken by sportsmen has a vastly different effect on the fishery than the harvest of several thousands of fish by the commercial industry on each opener. Nevertheless, if scientific research indicates that escapement quotas are way below target, then bag limit reduction for the sportfishermen might also be justified.

The criteria should just not be based on whether the commercial fishery is closed nor on how many days it has been closed. Rather it needs to be based on the overall escapement numbers and the effect commercial fishing and sportfishing have on meeting the escapement target. If the commercial fishermen take 93% of the harvest and the sportfishermen the other 7%, it would appear that all three new proposed restrictions (86, 87, and 88) might be targeting just the minor party in this equation without making much change in addressing the number of fish who are able to successfully spawn.

Sincerely,

Edmund K. Howell

[REDACTED]

Highland, UT 84003

[REDACTED]

Alaska Board of Fisheries

November 11, 2024

RE: Comments concerning Proposals 87, and 88 by the 2024 meeting of the Alaska Board of Fisheries for the Prince William Sound and Upper Copper River and Upper Susitna River

My husband and I greatly enjoy our fall fishing trips to Cordova. We plan for and look forward to them all year. We are both older and a little limited in our physical abilities, but still love to fish. There are limited places to fish in the Cordova area, and further restrictions increase crowding of the available areas and further limit fishing opportunities for people like us.

Proposal 87 Against

Limiting access to waters one mile above the confluence of the Alaganik Slough greatly limits access to some of the few areas that are easily accessible for those without a boat and for those who are older or somewhat mobility impaired. We are senior citizens and roadside areas near the Copper River Highway provide some of the few places that we can access. These places also provide a place to fish when fishing is difficult on the lower river and stream waterways due to commercial openers, cloudy river conditions or flood swollen rivers. These areas, that are at least somewhat accessible for the mobility impaired, would be closed if this proposal were adopted.

There are limited places to fish in the first mile from the confluence of the Alaganik, and some of these places are not very safe or easy to fish due to tidal flow, and they are not very accessible, without a boat. It is easy for fishermen, who walk in, to get trapped by raising tides in the first mile, and this lower part of the slough is also greatly affected by rain and silt from run off.

Proposal 88 Against

In 2024, a basic week long fishing trip to Cordova costs \$5,000 or more, per couple, including lodging and food. These trips must be booked many months in advance. These trips are booked long before final fishing limits and emergency orders are finalized. The sport fishermen dollars are an asset to the local community in the form of taxes, lodging, charter fees, and food purchases. Reduced limits make these trips less desirable and more impractical.

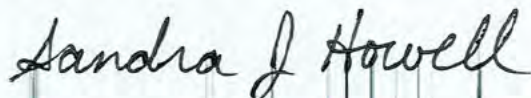
The sportfishermen harvest a small overall percentage of the harvested salmon. The reduction of sportfishing limits would have a minimal effect on overall escapement numbers compared to the effect caused by a single commercial opener. Why penalize sportfishermen when their effect on the total escapement is so much less significant. On a typical day in mid to late September, there are probably not more than 200 sportfishermen in the entire Cordova area, and many of these are crowded in places near the Copper River Highway.

A reduced limit of one or two fish per day greatly reduces fishing opportunities and makes the vacation cost impractical. The primary reason for tourism in Cordova is the fishing opportunity.

Cordova is beautiful, but without fishing opportunities, there are limited things to do in September in Cordova.

As silly as it sounds, the only way to equalize the effect on escapement between commercial and sport fishermen would be to limit the commercial fishermen to three fish per day, each, just like the sportfishermen. It truly would be impractical for the commercial fishermen, who take the vast majority of the annual harvest and need to harvest more fish to cover their costs and make some profit. But further reduced limits are also impractical for sportfishermen, who also spend significant dollars for the privilege of fishing to take only an estimated 7% of the overall harvest, even with full 3 fish per day limits. In overall fish escapement considerations, what increased number of fish per week would actually make it to the spawning grounds if the limits were reduced by one or two fish per day for sportsmen and women, considering that fact that many fishermen don't always catch full daily limits, anyway? Trying to make both the commercial fishermen and sportfishermen equally responsible for reaching escapement targets by reducing sportfishing limits does not make sense because the impact on escapement from sportfishing is not equal with the impact from commercial fishermen.

Thank you for allowing us to comment on these proposals.



Sandra Howell

[REDACTED]
Highland, UT 84003

Submitted by: Jestin Hulegaard

Community of Residence: Ridgefield

Comment:

Hatchery pinks are having a scientifically proven negative impact on the fitness of wild fish originating from Alaska to California. The economic value is being paid for by our most iconic species, Chinooks, which are getting smaller and having a harder time surviving in the ocean. We need to take action soon or we will lose them.

Submitted by: Jestin Hulegaard

Community of Residence: Ridgefield

Comment:

I support Proposal 14, 15, 16, 17, 78. Our chinook population is suffering along the entire West Coast. We have to take drastic action to preserve this iconic species. Trawl fishing is unsustainable and irreparably damages every single fishery it has ever been used. The bycatch is horrible and ludicrous. Hatchery pink salmon are also a threat to survival of chinook. With rising pressure from climate change, the North Pacific has more salmon than ever, mostly due to hatchery fish. Studies have shown the immense amount of hatchery pinks depress the availability of food for chinook. Again, we must take action or chinook will continue to shrink in size and population. How devastating if the North Pacific becomes a fish farm for 5 lb fish going to China.

Andrew Hull - Area E commercial drift gillnet fisherman and permit holder**Proposals 51, 52, 53 - Oppose**

As a permit holder and participant in the Area E commercial drift gillnet fisheries, I strongly oppose proposals 51, 52, and 53. These proposals limit ADFG's flexibility to best manage the commercial drift gillnet fishery according to the highly variable run timing of Copper River sockeye returns. Early season fishing openers are a valuable tool to fisheries managers by providing indices of fish abundance outside the river system, prior to the appearance of fish at the Miles Lake sonar site.

Run timing of Copper River sockeye is highly variable, with the midpoint in the sockeye return (date at which 50% of cumulative escapement is reached) differing by over 2 weeks during the past 10 years (Data obtained from ADFG website). The requirement of cumulative management objectives (proposals 51 and 53) and daily management objectives (proposal 52) being met offers too rigid of a framework for fisheries managers to account for the variability in run timing that is seen from season to season.

There are significant lag times between when fish congregate at the mouth of the Copper River to when fish are counted further upstream at the sonar site. Prolonged early season closures can lead to large buildups of fish that vastly exceed daily management objectives once they push upriver. For example, in 2024 drift gillnet fishing was limited to a single 12 hour commercial fishing opener in a 15 day span between May 24th and June 7th. Subsequently, the Miles Lake sonar site recorded passage of 154,062 fish between June 8th-10th, compared to a combined daily management objective of 38,224 fish for those three days. The midpoint in the 2024 sockeye return did not occur until June 23rd. (Data obtained from ADFG website)

By relying solely on sonar counts and daily/cumulative management objectives to govern early season fishing, these proposals restrict the tools available to ADFG to account for run timing variability and adequately distribute fishing effort over the early season. In addition to leading to over escapement, these proposals would cause significant loss of economic opportunity to Area E drift gillnetters by limiting early season harvest when market conditions are strongest.

Submitted by: Alison Humphrey

Community of Residence: Chugiak

Comment:

I adamantly OPPOSE Proposals 44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71 and Fully SUPPORT Proposals 48,51,52,53,58,59,70.

The proposals I staunchly OPPOSE listed above are clearly intended to benefit the FEW along with the out-of-state commercial fishing industries while depriving / limiting the MANY i.e the citizens of Alaska to include its 54K Veterans the benefits they are eligible for as residences of this great state. Additionally, the proposals we oppose clearly infringes on the rights / privileges on the 54K Veterans who call Alaska their home which they proudly Served to protect.

Submitted by: Mike Huston

Community of Residence: Eagle River

Comment:

Proposal 16. Close the trawling in prince william sound. It's a crime it's even allowed. They destroy every fishery they exploit.

11/26/2024

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Stoian Iankov. My family and I own and operate the F/V Michelle Renee. Our vessel is based out of Kodiak and we generate the overwhelming majority of our income from the trawl fisheries in the Gulf of Alaska. In July and part of August, we do salmon tendering in Prince William Sound and Bristol Bay, wherever needed.

We are a GOA vessel and there is no other place to go to. My son is the Captain of the boat and is a Kodiak resident, we employ 5 crewmen, and four are Alaska residents. And they have families.

Kodiak and its infrastructure relies heavily on the trawl fleet. We do all the necessary work for the vessel in Kodiak and the only time we leave is when what we need is not available. This has been a difficult year. Low ex-vessel prices are the same as in the 1980s. Processors not able to fulfil their orders. This is causing a strain on the trawl fleet, processors, and the support system in Kodiak.

The trawl fleet is heavily scrutinised and monitored. The PWS Pollock fishery is very well managed. There is a well established contact between the manager and the vessel operators. We are required to "check in" and the manager allows only 6-8 vessels in the area at a time. Upon finishing the trip we "check out." Sometimes the manager delays releasing a vessel to start fishing until the accounting is complete from the previous vessel, to make sure we do not exceed caps. Shutting down a well managed and a productive PWS fishery is the last thing we need. And it does not solve a thing, but only makes more problems. We also rely on our income from salmon tendering to get through the summer months when plants focus on salmon. Pollock are predators of young salmon and if left unharvested the pollock will eat all the young salmon hurting the PWS salmon fisheries.

This is why I STRONGLY oppose Proposals 14, 15, 16 & 17. Before making a decision, please consider these scientific factors that I have attached to my letter.

Sincerely
Stoian Iankov
F/V Michelle Renee

POLLOCK PREDICATION OF JUVENILE PINK SALMON

Research papers

“Ecological processes influencing mortality of juvenile pink salmon (*Oncorhynchus gorbuscha*) in Prince William Sound, Alaska”

Willette, T. M., Cooney, R. T., Patrick, V., Mason, D. M., Thomas, G. L., & Scheel, D. (2001). Ecological processes influencing mortality of juvenile pink salmon (*Oncorhynchus gorbuscha*) in Prince William Sound, Alaska. *Fisheries Oceanography*, 10, 14-41.

- Two facultative planktivorous fishes, Pacific herring, and walleye pollock, probably consumed the most juvenile pink salmon each year, although other gadids were also important
- Nine taxonomic groups of fishes and several seabird species consumed about 546 million juvenile salmon during the first 45 days of their life in PWS. These predation losses represented about 75% of the approximately 736 million juveniles that entered PWS from bordering streams each year and thus were within the range for survivals estimated during this life stage.
- The dominance of adult pollock in the system produces a state in which salmon may be more vulnerable to a population crash.
- The salmon enhancement industry in PWS has adopted the predator-swamping strategy. Our model simulations indicated that this strategy can fail if salmon densities decline to the satiation threshold when zooplankton densities are insufficient to shelter juveniles from predation. This is what occurred at WHN Hatchery in 1994 causing high mortality among high-density aggregations of salmon.
- Predation on fry by herring and pollock was apparently greatest from April through early June.
- Predation increased on years with low zooplankton biomass, triggering pollock and herring to find alternate food sources, such as salmon fry.

“Walleye Pollock as Predator and Prey in the Prince William Sound Ecosystem” Thorne, R. E. (2006).

Walleye pollock as predator and prey in the Prince William Sound ecosystem. *GADID STOCKS to FISHING AND CLIMATE CHANGE*, 289.

- Prince William Sound Science Center conducted winter-period surveys of adult pollock from 1995-2003. Pollock biomass in PWS ranged from 22,000-43,000 mt. The pink salmon predator monitoring studies assessed pelagic fish abundance and distribution synoptic with spring-period zooplankton surveys from 2000-2006. Both pollock and herring showed progressive migrations during the spring that were consistent with predation on inshore fishes including pink salmon fry.

“Foraging behaviour of juvenile pink salmon (*Oncorhynchus gorbuscha*) and size-dependent predation risk” Willette, T. M. (2001). Foraging behaviour of juvenile pink salmon (*Oncorhynchus gorbuscha*) and size-dependent predation risk. *Fisheries Oceanography*, 10, 110-131.

- All fish groups examined in the PWS fed to some extent on juvenile salmon. Trout and gadids consumed the greatest numbers of juvenile salmon per day on average.

“Acoustic monitoring of juvenile pink salmon food supply and predators in Prince William Sound, Alaska” Thorne, R. E., & Thomas, G. L. (2007, September).

Acoustic monitoring of the juvenile pink salmon food supply and predators in Prince William Sound, Alaska. In *OCEANS 2007* (pp. 1-7). IEEE.

- Several hatcheries annually release hundreds of millions of juvenile pink salmon into the water of PWS. Previous research has documented two critical factors in the juvenile salmon survival 1) the availability of large-bodied calanoid copepods, and 2) the abundance of walleye pollock.
- When *Neocalanus* abundance is low, pollock become piscivorous and are the dominant pelagic predator of pink salmon fry.
- Most pink salmon fry rearing in PWS are consumed by predators during their initial 60 days of early marine residence.

Submitted by: Pete Imhof

Community of Residence: Wasilla

Comment:

Proposals 51,52,53 I support, we all need to share the resources, sport and subsistence are continuing to get the burden of conservation with closures due to lack of king salmon stock, maybe it's time for thorough assessment and pre season forecast to determine when the commercial fisheries should be limited so we can all share the burden of conservation. with lack of fish in south central, Especially the mat valley where there's practically no fish for harvest...But more importantly we should all be on high alert with lack of king salmon stocks throughout Alaska, I really think forecasting and assessment of stocks to determine somewhat of an overall king salmon return would be very beneficial...

Submitted by: Efim Ivanov

Community of Residence: Wasilla

Comment:

I support proposal 14

I support proposal 16

I support proposals 46,47 if ADFG can use those numbers for the up river escapement.

I oppose proposal 48

I oppose proposal 51,52,53 using only the sonar to regulate commercial fishing can lead to overescapement on the copper river, with out commercial fishing openers to regulate escapement. ADFG has been doing a decent job at regulating the escapement goal with at least 1 opener a week.

November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am from Cordova, Alaska, and I am a retired commercial fisherman, having worked with both gillnet and seine. I fully support the hatcheries. Alaska's salmon hatcheries allowed me to catch more fish and make more money. Proposal 78 would result in fewer fish to harvest.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries

Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Bud Janson

[REDACTED]

Cordova, Alaska

Submitted by: Tim Jean

Community of Residence: Houston

Comment:

I support that there be no changes to the regulations as they are stated I also support that the commercial guided fishing trips on the Copper River or allowed to continue as they are now if there needs to be regulation, it should be at the mouth of the river, where the commercial fisherman are taking advantage and keeping the locals from getting the fish that they deserve

**BOF Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish Meeting
December 10 - 16, 2024**

Frank Jeffries

[REDACTED]

Anchorage, AK 99502

Thank you for your time. My input is as follows:

Proposal 45 oppose

Allowing subsistence fishing in closure areas while not allowing personal use is discriminatory to other users attempting to procure fish for use. The rationale given in the proposal is that it is ok for subsistence users because they are limited to 5 king salmon per household. Using that same rationale, personal use fishermen should be allowed the same access since they are limited to only one King salmon per year from the fishery.

Proposal 48 support

This allows access to the fishery for those who do not have the privilege of access to the shore or a boat of their own.

Proposal 49 oppose

This proposal unduly restricts those for outside the area from access to the fishery. If this is passed then subsistence users in all other harvest areas of the state should also be restricted to hunting/fishing only in the specific geographical area where they live. This would be patently unfair as is this proposal.

Proposal 50 oppose

Depth finders, chart plotters, etc. are generally all packed in the same unit. They are safety gear that allows boaters to more safely navigate the waters they are navigating. If a decision is made to restrict them in this fishery, doesn't it make sense also to prohibit them in all other fisheries? The escapement goals will not be helped by implementing this proposal and it is unnecessary and will increase the risk of accidents and damage to boats on the river.

Proposal 55 oppose

This ostensibly promotes "shared conservation" between upriver and down river commercial fishing. It does not. The author conflates commercial fishing with guide services and wants to shut down guides when the commercial fleet has restrictions while saying the rationale is based on coordination with others and historical data, though no data is presented. The facts are that the commercial fishery landed over 1.3 million reds and 8,200 kings last year compared to the

personal use fishery taking 160,000 reds and 200 kings. If kings are what we want to increase escapement of this proposal will have no significant impact on the success of the king run. It makes no sense.

Proposal 58 support

This will better allow the department to manage the escapement goals on both ends of the escapement range.

Proposal 60 oppose

This puts an undue restriction on personal use households. Personal use represents less than 10% of the commercial harvest and who knows how little of the subsistence catch. This proposal requests a 20% reduction of the personal use limit to address a 9% “over catch” issue that is most likely not recurring. This puts an undue hardship on personal use households as opposed to spreading the pain over all users.

Proposal 61 oppose

This will work a hardship on a vast number of personal use households for no appreciable gain for meeting escapement goals. This will essentially limit head of household limits until later in the season. Those who fish early in the season will need to make two trips to fill their freezer instead of one. In one of the earlier proposals, it was stated that it didn’t matter when subsistence users caught their fish because they were limited to 5 kings. If that argument works for subsistence it should work for personal use. It really doesn’t matter when the fish are caught, the limit is the limit and this proposal will have no discernable effect on overall escapement.

Proposal 62 oppose

This is unfairly punitive to the personal use fishery. In reality any impact of the personal use fishery is negligible compared to the subsistence and commercial catch. While I can appreciate the challenges faced by the commercial fishing interests, it makes no sense to hamstring personal use households when the harvest is less than 10% of the commercial fleet’s harvest. And who knows what a small percentage of the subsistence users’ harvest.

Proposal 65 oppose

Proposal 47 addresses this. It is not a good idea. Restricting permits to one week accomplishes nothing for the fishery. It makes it more work for personal use households to plan and complete their fishing trips. If something delays their trip they need a new permit. The earlier proposals regarding in season reporting can be accomplished without this proposal.

Proposition 68 oppose

This proposal will make personal use fishing more dangerous than it needs to be. Unlike the Kenai and Kasilof rivers the Copper River does not have long sandy beaches at the locations favorable for dip netting, many of them are along cliffs and rocky edges of the river. This proposal will effectively cut many personal use households off from an opportunity to harvest fish in the river. The adverse impacts of this proposal would overwhelmingly be experienced by seniors and those with physical impairments. This is manifestly unfair and discriminatory.

Proposition 69 oppose

Establishing more restrictions on dip netting from boats in an unnecessary change. Ultimately, escapement goals are what matters (It is ironic that the author of this proposal earlier proposed ways to make the commercial fleet more efficient in catching fish and another author of a proposal asking for permit stacking has the same name). This proposal calls for a restriction on dip netting practices with no apparent connection to, or impact on, sustainability of the fishery. It is unnecessary and should fail.

Proposal 70 support

This proposal will have no effect on escapement goals but it will increase the safety of the fishery. Opening this area to dip netting will relieve congestion on the river during times that many users are present and will reduce the chances for collisions, injuries, and potential loss of life due to accidents.

Submitted by: Pete Jenkins

Community of Residence: Anchorage, AK

Comment:

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fisherman. I've been a gillnetter, both drift and setnet, in Area E for the past 26 years. I've also longlined halibut and black cod in Prince William Sound and the North Gulf for over 20 years. I've either been engaged with or closely followed the Board of Fisheries process for most of this time; and find many of this cycle's proposals to be a direct threat to my livelihood and an unsubstantiated attack on the commercial fisheries (and hatcheries) in the Sound.

I respectfully ask you to consider my proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you.

Pete Jenkins, Emerald Bay Fisheries

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,

My name is Pete Jenkins. I've been a gillnetter, both drift and setnet, in Area E for the past 26 years. I've also long-lined halibut and black cod in Prince William Sound and the North Gulf for over 20 years. I've either been engaged with or closely followed the Board of Fisheries process for most of this time; and find many of this cycle's proposals to be a direct threat to my livelihood and an unsubstantiated attack on the commercial fisheries (and hatcheries) in the Sound.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Pete Jenkins

[REDACTED]

Anchorage, AK

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.: SUPPORT this proposal with CDFU

Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.: SUPPORT this proposal with CDFU

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 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.: OPPOSE this proposal with CDFU

Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.: SUPPORT this proposal with CDFU

Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 43 - Establish a directed octopus fishery in Prince William Sound.: SUPPORT this proposal with CDFU

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 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.: SUPPORT this proposal with CDFU

November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I have been commercial salmon fishing in Alaskan waters for 50 years. Sixty plus years as both sport and subsistence use of Alaska's rich salmon resources. I have seined, gillnetted, and set netted for salmon in Southeast Alaska, Bristol Bay and Area M. Since the hatchery program started fifty years ago it has added benefits to my commercial fisheries and sport fisheries, as well as my subsistence fishing. This proposal may not affect me directly now because I'm retired from salmon fishing commercially, but it is possible that it could impact my other users. It would substantially affect other members of my family who still make their living from commercial salmon fishing. It would also affect my community, the fish taxes generated from the salmon fisheries helps my community in many ways.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

John Jensen

A solid black rectangular box used to redact the signature of John Jensen.

Petersburg, Alaska

Submitted by: Leonard and Diane Jewkes

Community of Residence: North Pole Alaska (We have a boat in Valdez and fish in PWS)

Comment:

We fully support Prop #14 Due to the damage that the Trawler Fleet causes the ocean floor bed and all the bottom dwelling fish and marine life. This method also creates unacceptable amounts of By-Catch that do not survive

My comments are in strong opposition to proposal 78. I am a third-generation commercial fisherman in PWS, subsistence & sport fisheries participant, a Native Village of Eyak tribal member, business owner and resident of Cordova.

I am not going to go into the obvious and detrimental financial impact to the PWS fisheries & families, PWS hatchery programs, and the local economies to all towns and tribal villages that generate revenue from the success of the hatchery program.

My comments are for the Board to pause and exercise extreme caution in placing significant weight to the loud voices on correlative research with little talk or context of the “third variable problem” that make causal relationships difficult to interpret. Correlational studies have potential for confounding variables and extraneous variables. Confounding variables are a third variable that influences or shows an apparent association between the study variables where no real association exists. Extraneous variables are variables that aren’t being studied that have the potential to affect the outcome of the study.

The analysis and opinions of many of the studies used to support proposal 78 are quick to dismiss or gloss over the potential of these variables to come to their conclusions.

What I am asking the Board for is to not make a rash decision that has so many quantifiable negative impacts by passing this proposal but let the current and continuing research play out and help define these variables.

Prince William Sound and its fisheries has an amazing blend of hatchery stocks and wild resources for all salmon species. We have many native tribes, tribal organizations and residents that have a history of subsistence, sport and commercial activity for generations. We all want sustainability not just for the PWS area but for residents of the whole state.

It is on record that the author of proposal 78 has a personal quarrel with PWSAC going back decades. There is history of this proposal or others like it submitted many times over many BOF cycles in the hopes that as Board members change, the outcome will change. I have hope and faith that objective science and informed conversation win the day over a grudge. I look forward to continued studies on salmon and studies on interactions of all species in the North Pacific ecology leading to the day we can get answers to our questions.

Eli Johnson

Submitted by: Christopher Johnson

Community of Residence: Wasilla

Comment:

I oppose proposal 89 because there is a growing amount of fishing pressure at Lake Louise and the burbot will decline once again if the limit is raised.

I support proposal 90 because there are local guides and recreational fisherman that take advantage of the 5 line rule and use it to catch lake trout purposely.

Submitted by: Dale Kaercher

Community of Residence: Anchorage

Comment:

Dear Board of Fish members:

RE: PROPOSAL 16: 5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

I am writing in support of Proposal 16 to close the state-managed Prince William Sound (PWS) pollock trawl fishery. Trawling is an indiscriminate fishing method that leads to concerning levels of bycatch. Chinook salmon are struggling in large regions of the state resulting in Alaska Department of Fish and Game (ADFG) closing or heavily restricting fishing for sport and subsistence fishing throughout the state. The National Marine Fisheries Service now estimates bottom contact up to 60% of the time for trawl vessels like those used in PWS. The bycatch that is found in the trawl nets displays an unsustainable fishery that is dragging the seafloor. It is in the best interest of the State of Alaska to protect our resources and marine environment and close the state-managed PWS trawl fishery.

November 24, 2024


Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am from Cordova, Alaska, and I am writing to express my strong opposition to Proposal 78. My husband and I owned and operated a commercial fishing business for over 30 years, fishing in Prince William Sound, the Copper River, and the Gulf of Alaska. I am currently retired but still hold permits and continue to participate in subsistence fishing. I have lived in Cordova for nearly 50 years and have been involved in the fisheries here since 1975. We raised our daughters fishing and participated in the PWS seine fishery.

I remember all too well the sad state of the PWS seine fisheries before the hatcheries were established. My daughter and her husband have recently invested in the PWS Seine fishery, and intend to raise their kids in fishing. A reduction in egg take levels would have financial negative effects on returns. I am concerned the rising cost of fuel, groceries, insurance and a depleted return would have a devastating effect on the fishing families of PWS and our local government. I see no concrete argument written in this proposal to warrant this 25% decrease.

Sincerely,
Patricia Kallander


Cordova, Alaska

November 24, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am from Cordova, Alaska, and I am writing to express my strong opposition to Proposal 78. My husband and I owned and operated a commercial fishing business for over 30 years, fishing in Prince William Sound, the Copper River, and the Gulf of Alaska. I am currently retired but still hold permits and continue to participate in subsistence fishing. I have lived in Cordova for nearly 50 years and have been involved in the fisheries here since 1975. We raised our daughters fishing and participated in the PWS seine fishery. I remember all too well the sad state of the PWS seine fisheries before the hatcheries were established. My daughter and her husband have recently invested in the PWS Seine fishery, and intend to raise their kids in fishing. A reduction in egg take levels would have financial negative effects on returns. I am concerned the rising cost of fuel, groceries, insurance and a depleted return would have a devastating effect on the fishing families of PWS and our local government. I see no concrete argument written in this proposal to warrant this 25% decrease.

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,
Patricia Kallander


Cordova, Alaska

Oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

At the Chitina Personal Use fishery Alaskans harvest less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Well over 500,000 sockeye and tens of thousands of kings still are reported upriver every year. Sharing returning salmon among Alaskans is the law under state abundance-based management.

Oppose Proposal #63 and #65 submitted by the Athna Intertribal Fish and Wildlife Committee. Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery on the Copper River.

Oppose Proposal #64 submitted by the Cordova District Fisherman United to restrict Alaskan households gather salmon under both an Upper Cook Inlet personal use salmon fishery permit and a Chitina personal use permit during the same year.

Currently there is ample returning salmon to feed Alaskans in the town of Cordova while allowing families who choose to access publicly owned salmon for family use in the Copper River drainage.

Lindsey Kangas

Submitted by: Joseph Katz

Community of Residence: Cordova, AK

Comment:

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fisherman. I have been fishing for nearly 7 years now. I've been a permit holder in Area E for 4 years.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Joey Katz

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,

My name is Joey Katz. I have been fishing for nearly 7 years now. I've been a permit holder in Area E for 4 years.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Joseph Katz

A solid black rectangular box used to redact the signature of Joseph Katz.

Cordova

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.: SUPPORT this proposal with CDFU

Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.: SUPPORT this proposal with CDFU

Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 23 - Prohibit the retention of sablefish from state waters.: SUPPORT this proposal with CDFU

Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.: OPPOSE this proposal with CDFU

Proposal 27 - Modify rockfish bag and possession limits.: SUPPORT this proposal with CDFU

Proposal 28 - Modify the rockfish area, bag and possession limit.: OPPOSE this proposal with CDFU

Proposal 29 - Create additional provisions for yelloweye rockfish management.: SUPPORT this proposal with CDFU

Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.: SUPPORT this proposal with CDFU

Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.: OPPOSE this proposal with CDFU

Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.: SUPPORT this proposal with CDFU

Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.: SUPPORT this proposal with CDFU

Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.: SUPPORT this proposal with CDFU

Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 43 - Establish a directed octopus fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.: SUPPORT this proposal with CDFU

Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.: SUPPORT this proposal with CDFU

Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.: OPPOSE this proposal with CDFU

Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.: SUPPORT this proposal with CDFU

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.: OPPOSE this proposal with CDFU

Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.: SUPPORT this proposal with CDFU

Proposal 58 - Amend the Copper River King Salmon Management Plan.: OPPOSE this proposal with CDFU

Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.: OPPOSE this proposal with CDFU

Proposal 60 - Modify the annual limit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.: SUPPORT this proposal with CDFU

Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.: OPPOSE this proposal with CDFU

Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.: SUPPORT this proposal with CDFU

Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.: SUPPORT this proposal with CDFU

Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.: OPPOSE this proposal with CDFU

Proposal 71 - Prohibit guiding in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.: SUPPORT this proposal with CDFU

Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.: OPPOSE this proposal with CDFU

Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.: SUPPORT this proposal with CDFU

Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.: SUPPORT this proposal with CDFU

Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.: SUPPORT this proposal with CDFU

Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.: OPPOSE this proposal with CDFU

Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.: SUPPORT this proposal with CDFU

Proposal 85 - Modify the bag and possession limit for coho salmon.: OPPOSE this proposal with CDFU

Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.: SUPPORT this proposal with CDFU

Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.: SUPPORT this proposal with CDFU

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.: SUPPORT this proposal with CDFU

Proposal 97 - Reduce the minimum herring spawning biomass threshold.: SUPPORT this proposal with CDFU

Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.: SUPPORT this proposal with CDFU

Submitted by: Matthew Keith

Community of Residence: Chugiak

Comment:

Bycatch is destroying our fisheries. It is particularly hard on PWS. As a boater and fisherman in the Sound for over twenty years I have seen the constant reduction in fish populations and restrictions placed on sport fishing while commercial fishing and trawling continues. Other countries find ways to eliminated bycatch, we should too. Furthermore, these types of restrictions should be applied to the Gulf and Bering Sea to protect our fisheries. We have all seen the decimation of king and chum salmon populations across the entire western and south central regions. We have also seen a constant trend of halibut population reductions. It is time to act and find ways to responsibly maintain commercial fisheries without wanton waste caused through bycatch.



COMMENTS ON 2024-2025 PRINCE WILLIAM SOUND/COPPER RIVER BOARD OF FISHERIES PROPOSALS

KRSA evaluated proposals based on their application/implications for sustainability, allocation, and orderly fisheries.

- Sustainability is considered in relation to needs and effects for meeting established escapement goals.
- Allocative proposals are considered on their merits rather than implied sustainability concerns. Proposals for reallocation of fishery harvest are often falsely represented as sustainability rather than allocative in nature
- Proposals for orderly fisheries concern effective implementation participant cost, safety, and enforcement.

KRSA also examines each proposal for what we call, “red flags.” These include:

- Proposals authored by individuals or groups seeking restrictions in fisheries other than the one they participate in while using conservation as opposed to allocation, as a justification.
- Proposals asking for more opportunity in the fishery they participate in, while at the same time proposing to restrict others, and again, using conservation as justification.
- Proposals where ADF&G is neutral on restrictions of one user, but in support of restrictions on another group.

Proposals are considered as written. Some proposals may include elements that have merit, but KRSA opposes these broader proposals which include other questionable elements.

Where actions are considered with respect to sustainability, subsistence fisheries clearly take priority and restrictions of commercial, sport and personal use fisheries should be implemented in proportion to existing use.

Copper River Salmon (29 proposals)

Subsistence (7 proposals)			
44	Allow more than the legal limit of gillnet gear to be onboard a vessel used in the subsistence salmon fishery	Creates great difficulty in determining end use of fish.	Oppose
45	Allow subsistence fishing for salmon in the Copper River inside closure area	Inside closure is for conservation of king salmon.	Oppose
46	Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery	Not necessary for in-season management for established fishery objectives.	Oppose
47	Require in season reporting in subsistence and personal use fisheries	Not necessary for in-season management for established fishery objectives.	Oppose

48	Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict 45	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Support
49	Prohibit transport services in the Glennallen Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
50	Prohibit the use of chartplotters or fish finders in the Chitina and Glennallen Subdistricts	Necessary for safe navigation.	Oppose
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 in concept
52	Reduce commercial salmon fishing opportunity in the Copper River District	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023.	Support in concept
53	Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023.	Support in concept
54	Restrict use of Copper River District inside closure area during statistical weeks 20 and 21	The management objective (escapement goal) for king salmon was not achieved in 2022 or 2023. Adoption of this proposal would increase harvest potential for king salmon.	Oppose
55	Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted	Implementation of this proposal would have no effect on ability to manage for established in river goal objectives.	Oppose
Personal Use (14 proposals)			
58	Amend the Copper River King Salmon Management Plan	Staff Proposal	Support
59	Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan	Staff Proposal	Support
60	Modify the annual limit for the Chitina Subdistrict	Reduce Bag Limit	Oppose
61	Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict	Reduce Bag Limit	Oppose
62	Allow in season adjustment of the Copper River personal use maximum harvest level	Reduce Bag Limit	Oppose

63	Amend the opening date of the Chitina Subdistrict personal use fishery	Restrict PU fishery for “genetic diversity”	Oppose
64	Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year	Prohibit an Alaskan resident from participating in both Chitina and Cook Inlet personal use fisheries. Punitive and unnecessary, would have no effect on ability to manage for sustained yield.	Oppose
65	Require a weekly permit and in season reporting in the Chitina Subdistrict	Not required for management.	Oppose
66	Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal	The Chitina Subdistrict is not a terminal harvest area and management for Gulkana hatchery broodstock should have a negative effect on management for the wild stocks.	Oppose
67	Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict	Opposed out of concern for safety of participants.	Oppose
68	Prohibit dip netting from a boat in the Chitina Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
69	Establish restrictions when dip netting from a boat in the Chitina Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
70	Extend the lower boundary of the Chitina Subdistrict	This is long overdue.	Support
71	Prohibit guiding in the Chitina Subdistrict	Resident Alaskans should not have to risk their safety or invest in expensive, difficult to operate equipment to access fish to which they are given priority in statute.	Oppose
Sport (1 proposal)			
72	Close sport fishing for salmon based on water temperature in the Gulkana River	This is a new one for Alaska. It's not very implementable.	Oppose

PC313

Submitted by: Munsey Kennon

Community of Residence: Homer , Alaska

Comment:

On the order of amendment of 73 and 74, being able to stack permits on a vessel would further decrease the amount of vessels fishing and allow fisherman to actually make a living.

PC314

Submitted by: Cory Kent

Community of Residence: Anchorage

Comment:

Please manage Trawling at a rate that does not discriminate fish populations for the Alaskan population. All life is connected in some way in our shared ecosystem. Trawlers jobs are not more important than all others.

PC315

Submitted by: Hunter Keogh

Community of Residence: Wasilla/Ninilchik

Comment:

I strongly support shutting down the PWS pollock trawl fishery. All of our fisheries in the state are hurting due to the trawl fleet and PWS is too small of an area to let draggers in to mop up what is left. It is directly effecting the substance life of Alaskans.

PC316

Submitted by: Brian K. Kerley

Community of Residence: Tok

Comment:

I oppose Alaska Board of Fisheries proposals #63, #64, and #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

Submitted by: Aldean Kilbourn

Community of Residence: Paxson Lake and Fairbanks

Comment:

re: proposals that would affect Chitina Personal Use Dipnetting

As someone who values the fish my family and I have taken from the Copper river as part of our yearly diet, I want my voice heard on the following proposals.

I don't feel that the Cordova Drift Fishermen nor the Ahtna Regional Native Corporation should have any more access to the fish that go upstream to spawn than my family and me.

I oppose the following proposals before the Board:

44,45,46, 49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,& 71

All of these have a means to limit fish taken by my family and me.

I think that there is reason to support these proposals because they look to provide equality amongst all users and help keep Copper river fisheries healthy.

47, 48,51,52,53,58,59,70

I am submitting personal comments as my own thoughts and concerns not to be affiliated with any board or organization I am on or part of.

I am a second generational born Cordovan, a NVE member, Eyak Corp shareholder, PWS sable fish permit holder, subsistence user, owner of a short-term lodging business (that support lodging to sport fishermen Aug-Sept), and most important a father. It is my opinion based off of the department's ability to consider a decision to support, appose, or obtain neutral that there is an inconstancy in the decisions being made at a management level. Multiple proposals have varied in the department's decision in this matter. These decisions should be based off of data that has been collected and be based off research that is being collected and/or has been collected. This inconsistency has led to a lack of trust for many user groups. That there is a vendetta, and the liability of this will result in negative repercussions for future preservation of these resources.

There should be accountability on all playing fields to ensure the resources are sustainable for future generations. Every user group of our resources should rely on unbiased direction, based off of correctly recorded data that is collected by these entities, not political agendas and propaganda. Without the ability to report timely, accurate data we will certainly decimate these resources we enjoy today, for future generations. This is a shared resource, and responsibility should also be shared. Proposals that would require timely reporting, establish more consistent bag limits amongst classified user groups, are two small steps to insure future stock for the next generation.

I'm stating this to call out the inconsistencies the department has as well as to address the issue the department has as data or the ability they have to collect accurate current data. Knowing that funding is an issue to collect this data is a main issue. It's disappointing that the

department is not supportive or neutral in these^{PC318} proposals for test fisheries, that would supply the data at no cost to the state. Any proposal that has been brought forth with reasonable allocations, parameters, that the state has apposed with nothing more than response of "there isn't enough data to support this proposal or fishery" should be granted a reasonable second look.

My main ask of the board is "Please keep an open mind". There are many residents in our community that can and will be affected by the decisions that are made during these meets. A community that is made up of multiuser groups, subsistence, sport, commercial, and Alaska Natives, not the preconceived notion that only one user group utilizes the resources on the lower Copper River, which seems to be the most regulated area of the Copper River.

Lastly, my only drive is to do my part to ensure

my children have the same resources and opportunities that I have been privileged to. That they will also be gifted stability in a rural coastal community so they may chose to also reside here from generation to generations.

Kyle King

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fishermen.

My husband and I have been fishing the area E drift gillnet fishery since 2019 after purchasing our boat in 2018. We have owned our drift permit since 2016.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Meghan King

[REDACTED]

WA state

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

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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

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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

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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

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Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.: SUPPORT this proposal with CDFU

Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.: OPPOSE this proposal with CDFU

Proposal 71 - Prohibit guiding in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.: SUPPORT this proposal with CDFU

Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.: OPPOSE this proposal with CDFU

Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.: SUPPORT this proposal with CDFU

Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.: SUPPORT this proposal with CDFU

Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.: SUPPORT this proposal with CDFU

Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.: OPPOSE this proposal with CDFU

Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.: SUPPORT this proposal with CDFU

Proposal 85 - Modify the bag and possession limit for coho salmon.: OPPOSE this proposal with CDFU

Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.: SUPPORT this proposal with CDFU

Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.: SUPPORT this proposal with CDFU

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.: SUPPORT this proposal with CDFU

Proposal 97 - Reduce the minimum herring spawning biomass threshold.: SUPPORT this proposal with CDFU

Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Submitted by: Tera Klein

Community of Residence: Fairbanks

Comment:

With the lack of fishery protection in the State of Alaska from trawlers and commercial fishing groups has been detrimental to my subsistence lifestyle. Now yearly struggling to fill our freezer with fish that we use for the entire year, and the fish I would fill those with are being pillaged by foreign entities from my native state is unacceptable.



Kodiak, AK 99615

To: Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

November 26, 2024

RE: Proposal 78 – 5AAC 24.370 Prince William Sound Management and Management and Salmon Enhancement Allocation Plan

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) would like to thank the Board for this opportunity to comment on and voice our **opposition to Proposal 78** at the upcoming Prince William Sound meeting of the Board of Fisheries in Cordova.

Although Proposal 78 targets Prince William Sound (PWS) pink and chum salmon-producing hatcheries, it's implications, if passed, are far-reaching—potentially affecting all pink and chum hatcheries state-wide, as is the proponent's stated goal. Additionally, Proposal 78 is the same, or very nearly the same, proposal that has been before the Board in multiple instances for over 2 decades. At each turn and in each region, the Board has rejected the arbitrary, damaging, and unsupported 25% cut to hatchery production. Once again, there is neither more evidence nor a solid rationale supporting the contentions of Proposal 78. Furthermore, this proposal will cause certain harm to the people, the communities, the economy, and all the salmon users in Prince William Sound.

Proposal 78 was already heard and rejected by the Board as Proposal 55 at the most recent PWS Board of Fisheries meeting in 2021. In this current iteration, the proposer takes aim at the Prince William Sound Salmon Enhancement Allocation Plan as a means or vehicle to suggest the Board could reduce production for all PWS hatcheries. The PWS Salmon Enhancement Allocation Plan does not regulate hatchery production. It regulates the allocation of harvest of returning adult fish that are the product of Prince William Sound Aquaculture Corporation (PWSAC) hatcheries and is thus not an appropriate vehicle for the proposed action. While the proposal takes aim at all PWS pink and chum salmon-producing hatcheries. The target regulation and allocation plan is not inclusive of the Solomon Gulch Hatchery operated by Valdez Fisheries Development Association. For this reason, too, the cited regulation and the proposal itself are

not appropriate to the requested action. Generally speaking, it appears there are no regulations that directly refer to hatchery egg take permitted numbers that fall within Board authority. This is also a topic that has been discussed by the Board through the various iterations of this proposal. In all likelihood, the lack of the existence of hatchery permits in regulation is, at least in part, because the Department of Fish & Game has explicit authority to make those decisions.

In addition to the fact that Proposal 78 utilizes a regulation that is not a proper vehicle to address hatchery egg take permits, there's a good chance that attempting to use that regulation as a vehicle to change hatchery permitted egg take numbers would actually disrupt the ability of the allocation plan, for which the regulation exists, to meet the stated goals of the existing regulation. This issue was also cited in the ADF&G comments (RC2) for this meeting.

As with previous proposals of this type, it is necessary to point out that the proposed cut to pink and chum salmon production has no basis or foundation for the percentage of the proposed cut. It's a completely arbitrary percentage with no stated expected outcome other than a desire for less hatchery production. What analysis was conducted to determine this percentage will be sufficient to produce a desired result beyond "less"? What benefit will be conveyed? How is that to be quantified? What is the measure of success? These questions have not been answered, and in fact, it appears uncertain what actual problem the Board would be addressing by approving such a proposal.

What we do know about the outcome of this proposal, should it be passed by the Board, is the harm that will certainly be immediately conveyed to the people, fishers, communities and businesses in Prince William Sound. Record Copy 2 (RC2) for this meeting quantifies a dollar figure as an average of \$14.4M in annual pink and chum commercial ex-vessel value alone. When you factor in the multiplier effects of \$14.4 million dollars flowing through the communities and businesses in PWS and Southcentral Alaska as well as the loss in first wholesale value to processors, the lost jobs and the lost, related economic activity by support services, the 25% reduction in hatchery production will have an economically destabilizing effect in a number of Alaska communities. In contrast, cutting a significant portion of Prince William Sound's hatchery pink and chum salmon production, will have an almost insignificant effect on the overall biomass of pink and chum salmon in the North Pacific Ocean (see included attachment, RC70 from the 2024 Upper Cook Inlet Board of Fisheries meeting). To simplify: to take such drastic action against PWS hatchery programs without clear and conclusive scientific evidence supporting the need for such a reduction would be an act of deliberate act of harm to Alaska's fishermen and fishery-dependent communities with no clear benefit and no tangible nexus with any *potential* benefit.

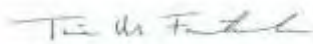
The enactment of this proposal will also damage the Prince William Sound Aquaculture Association's and Valdez Fishery Development Association's ability to maintain their

commercial programs, meet debt service and continue to provide benefit to the subsistence, sport and commercial fisheries of Prince William Sound and Southcentral Alaska. Pink and chum salmon provide not only direct benefit to commercial fisheries, they provide the main source of income for the Association. That income is then allocated to debt service, maintenance, and sustaining enhancement programs that are not “cost effective” such as programs for other species like coho, sockeye and Chinook. These additional enhancement programs provide benefit to ALL common property users—subsistence, sport, and commercial. Without the production and cost recovery opportunities for pink and chum salmon cuts would necessarily have to be made to the programs that did not generate revenue.

Alaska Hatchery operators have submitted a synthesis of numerous scientific papers, which has been updated for this meeting and will be on the record as a separate public comment, that provides a look at empirical science to counter the anti-hatchery rhetoric. This rhetoric is often portrayed in the news and through correlative science that begins with a premise that something wrong is to be found with Alaska Hatchery production. Repetition does not make something true. (see also KRAA comments on normative and advocacy-based science, PC128 for the 2024 Upper Cook Inlet Board of Fisheries meeting).

In summary, Proposal 78 is the same proposal the Board has rejected many times. The proposal improperly targets a regulation in Prince William Sound that isn’t associated with hatchery egg numbers and may render the regulation nonsensical and unworkable. The proposal has no clear or verifiable goal stated, no credible scientific basis, and no analysis of impact or whether there would be any benefit at all to local wild stocks, let alone those of other regions. Finally, the proposal would come at a huge cost to the people, fishers, and communities of Prince William Sound and Southcentral Alaska. We ask that you reject Proposal 78 because of its lack of merit and damaging consequences.

Thank you for the opportunity to submit these comments.



Tina Fairbanks
Executive Director

February 25, 2024

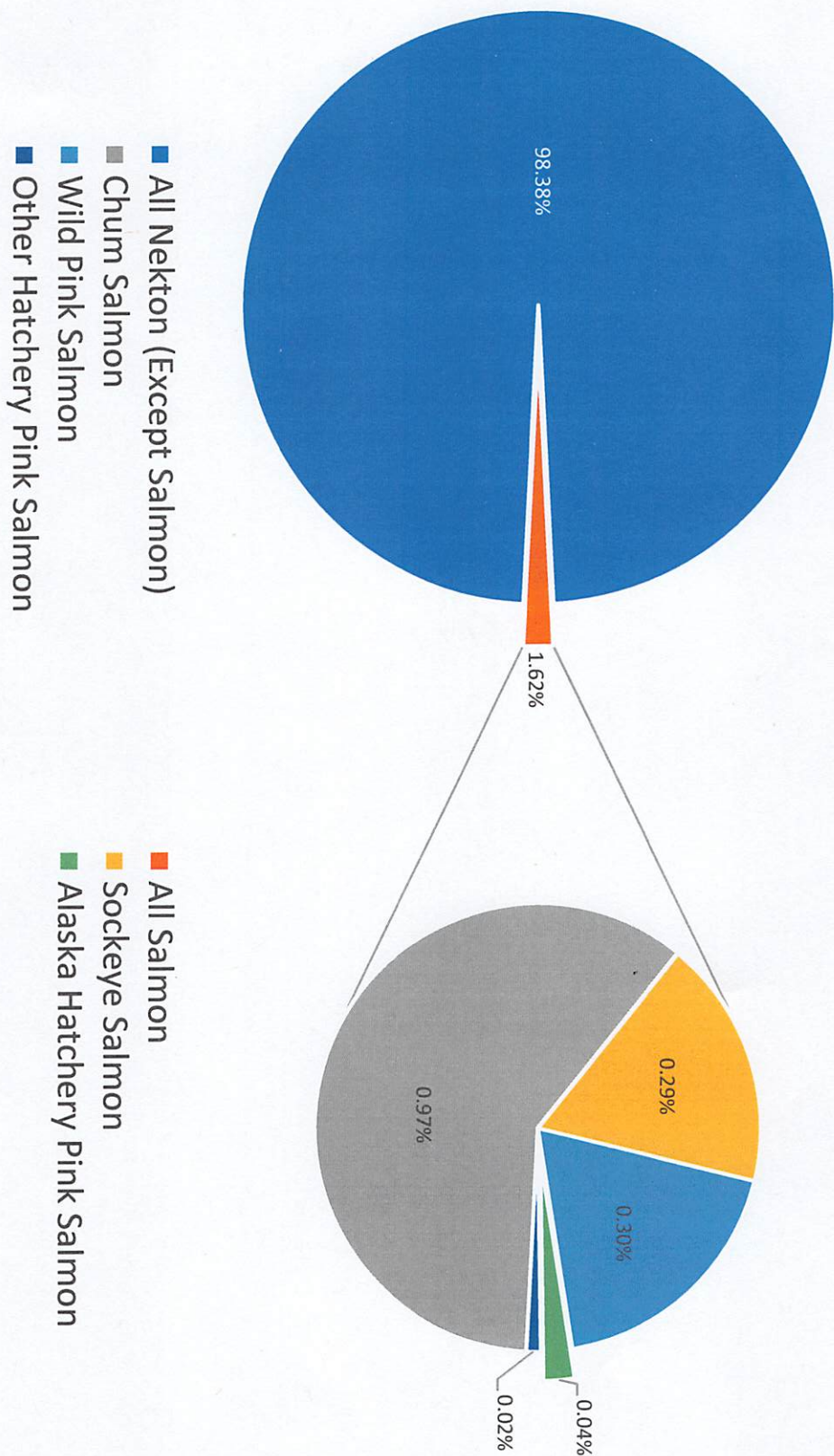
Alaska Board of Fisheries
1255 W. 8th Street
Juneau, AK 99811

Members of the Board of Fisheries,

Alaska's PNP Salmon Hatchery Operators respectfully submit this illustration showing the estimated percentage of Alaska's hatchery produced pink salmon within the total biomass of all Pacific salmonids and the biomass of all North Pacific Ocean nekton.

Thank you for the opportunity to contribute further relevant information to the discussion of the effects of hatchery pink salmon on the ecosystem.

North Pacific Nekton Biomass



Source: Wertheimer & Heard 2018. High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate



Kodiak Seiners Association

Kodiak, AK 99615

November 26, 2024

To the Alaska Board of Fisheries,

The Kodiak Seiners Association (KSA) is writing in **opposition to proposal 78**, which seeks to reduce hatchery pink chum egg take levels by 25%. Although KSA strongly prefers not to engage on management decisions outside of the Kodiak region, we believe that this proposal sets a poor precedent for statewide salmon management and hatchery regulation and so we are compelled to weigh in on the subject.

The proposed large-scale cuts to hatchery output would result in certain and quantifiable negative economic outcomes for the PWS area and the state as a whole, while achieving unidentifiable and largely speculative gains. It is entirely unclear how reducing Gulf of Alaska (GOA) hatchery output would impact other salmon stocks when considering the proportion of total salmon biomass that is actually comprised of GOA salmon of hatchery origin. It is even more uncertain, and in truth unlikely, that adjustments to PWS egg take levels will have a measurable impact on Western Alaskan salmon stocks – KSA is currently unaware of any studies examining interactions between GOA stocks of hatchery origin and Western Alaskan chum and chinook stocks. In fact, these stocks likely interact far more with Asian and Russian stocks of hatchery origin, and the latter will likely continue to increase output to fill any market voids left by cuts to Alaskan production.

The hatchery programs in various regions around the state are all very different in scale and variety of production, enhancement goals, and overall success rates. Regulatory limits on enhancement programs need to be carefully considered and should result from thorough analysis specifically tailored to the program under consideration. This proposal is largely arbitrary and lacks any of the specificity that should be required before imposing this level of hardship on Alaskan fishing communities.

Darren Platt

KSA President

Submitted by: Arthur Konefal

Community of Residence: Fairbanks

Comment:

I recently read an email from the Chitina Dipnetters Association regarding the BOF proposals and I want to give my support to each of their recommendations. I found their reasoning to be both sound and fair and urge the BOF to support their choices.

Thank You.

Submitted by: Arseny Konev

Community of Residence: Wasilla

Comment:

I support proposal 76

I oppose proposals 5,7,51,52,53

Submitted by: Danikt Konev

Community of Residence: Cordova

Comment:

I am strongly opposed to proposals 48,51,52,53,59 because I feel like it will affect the fishery greatly and not for the better.



Anchorage, AK 99503

November 25, 2024

Dear Members of the Alaska Board of Fisheries,

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has approximately 4,600 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Koniag has long advocated on issues affecting the viability and sustainability of the villages in our region. As part of this effort, Koniag supports sustainable salmon fisheries and strong hatchery production in Alaska.

Koniag writes today to express serious concerns and strong opposition to Proposal 78, which aims to reduce hatchery production of pink and chum salmon by 25% in Prince William Sound. As an organization dedicated to the prosperity and well-being of the communities we serve, we find that this proposal could severely disrupt not only a nearby region, but also set a troubling precedent for fisheries management across Alaska.

The proposed reduction in salmon hatchery output is alarming. Salmon hatcheries, including those managed by the Prince William Sound Aquaculture Corporation (PWSAC), are integral to the economic health of our region. They support numerous industries beyond just commercial fishing, including recreational tourism and local service sectors. A reduction of this magnitude threatens jobs and the economic lifeline of communities throughout Prince William Sound.

Hatcheries are vital for maintaining the stability of salmon populations that support diverse ecosystems. They provide a buffer that helps sustain salmon runs during variable environmental conditions, which are increasingly unpredictable due to climate change. A cut in hatchery production compromises this stability, potentially leading to greater fluctuations in salmon availability for all user groups.

Koniag's concern extends beyond the immediate effects of Proposal 78. Its adoption could initiate a series of regulatory actions aimed at further reducing hatchery outputs across the state. Such a precedent could progressively weaken the framework that has supported Alaska's fisheries for decades, leading to broader ecological and economic repercussions.

We urge the Board to consider the extensive implications of implementing such drastic changes without clear, science-backed justification. Maintaining robust hatchery operations is

crucial for the health of our fisheries and, by extension, our community's economy and cultural heritage.

Koniag stands with other stakeholders in urging the Board of Fisheries to reject Proposal 78. We advocate for a measured, science-driven approach to fisheries management that considers the long-term impacts on all communities, including those we represent.

Koniag appreciates the Board's consideration of our position on this vital issue. We hope that our input contributes to a decision that ensures the sustainability and resilience of Alaska's fisheries for future generations.

Thank you for your attention to this matter. Please contact Koniag Regional and Legislative Affairs Executive Tom Panamaroff (tom@koniag.com) if you have any further questions.

Sincerely,



Shauna Hegna
President



November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I have participated in commercial, sport, personal use, and subsistence fishing activities in the four coastal communities I have lived in - Anchorage, Kenai, Kodiak and Cordova. Currently in Cordova, I participate in subsistence and sports fisheries.

As the local electric utility manager and former mayor of Cordova, the hatcheries are a key component to Cordova and generate significant energy sales, raw fish tax revenues, shipping and transportation economies of scale, employment, and secondary economic activity in Cordova and the region including Anchorage. Electricity rates would be higher in Cordova without hatchery stock seafood processing sales.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Clay Koplin

[REDACTED]

Cordova, Alaska

Submitted by: Ana Ku

Community of Residence: Homer

Comment:

I am a 26 year pws drift/longline fisherwomen and all that I oppose and support on this survey is in support of the fishery I've seen go down hill from all the allowable trawling and king dipnet fishing that's changed and been allowed in the last years.

Submitted by: Karen Kurtz

Community of Residence: Anchorage

Comment:

Opposed to 89. Increasing the number of burbot from Lake Louise will decimate levels or reduce numbers too quickly.

Submitted by: Daniel Kuzmin

Community of Residence: Salem, Or

Comment:

I oppose proposal 51, 52, and 53

Submitted by: Dimitry Kuzmin

Community of Residence: Homer and Cordova AK

Comment:

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By

the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be fathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

PC331

Submitted by: Dimitry v Kuzmin

Community of Residence: Homer

Comment:

I'm a 25 year Pws drift/ longline fisherman. I support and oppose everything in this survey to help remove trawlers from Pws because I have seen the longline fishery go downhill since they have been allowed into Pws. And I think the dip net fishery also needs restrictions with its mismanagement on the way it's run. I support permit stacking for more opportunity to use the permits that are sitting unused.

PC332

Submitted by: Feodosia Kuzmin

Community of Residence: Wasilla

Comment:

I oppose 51,52,53

PC333

Submitted by: Kondra Kuzmin

Community of Residence: Wasilla ak

Comment:

I oppose 51,52,53

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I am a Prince William Sound drift gillnetter. I oppose Proposal 48 and support Proposal 49.

Subsistence guiding and transportation should be illegal in the Copper River subsistence fishery to protect the integrity and purpose of the fishery. Subsistence rights are intended for personal use by eligible individuals and their households, ensuring access to traditional resources for food security and cultural practices. Allowing guiding or transportation services for profit could lead to overharvesting, strain on the fishery, and unfair advantages for those who can't afford such services, undermining the sustainability of the fishery and disadvantaging local communities who depend on it.

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

I fully support Proposal 13 to increase bycatch limits for skate in the Prince William Sound Pacific cod fishery. With reduced Pacific cod quotas and a healthy skate population, this change would provide valuable economic opportunities for small vessel fleets and boost local economies. It's a practical solution to better utilize an underused resource while reducing waste and supporting coastal communities.

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I am a Prince William Sound drift gillnetter. I am writing to express my support for Proposal 56 and 57.

A dual-permit operation would greatly benefit fishermen, especially in today's economic climate where the cost of living and operational expenses are climbing rapidly while fish prices remain stagnant. By allowing fishermen to hold two permits, they could increase their harvest capacity, leading to greater efficiency and

higher overall earnings. This added flexibility would help offset rising costs for fuel, gear, and maintenance, making it easier for fishermen to sustain their livelihoods and remain competitive in an industry facing constant financial pressures.

PC334

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I support Proposal 50 because it helps ensure fairness by preventing those with expensive equipment from having an advantage.

PC334

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I oppose Proposal 52. I see no point in implementing this change. If we follow this approach, we risk overescapement, and Fish and Game already knows how to manage the timing effectively. They already shut us down when needed in some years, so there's no need for additional restrictions. The current management system works well and doesn't require these changes.

PC334

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I oppose Proposal 53. The past couple of years have shown that the early wild stocks were strong, so there's no need to close after the first two openings. Fish and Game already has a solid strategy in place, and the current approach is working well. Implementing an early closure would unnecessarily harm the commercial fleet.

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I oppose Proposal 51. Fish and Game already has an effective strategy in place for managing the Copper River commercial fishery, adjusting openings based on sonar data and stock assessments. The proposed restriction of limiting commercial fishing after two openings, based on a 70% sonar passage threshold, is unnecessary. It could disrupt the commercial fleet and harm the local economy without providing significant benefits for salmon conservation. The current management system is working, and there is no need for additional, burdensome limitations.

Submitted by: Larion Kuzmin

Community of Residence: Homer, Alaska

Comment:

My name is Larion Kuzmin, and I support Proposal 68. The increased use of boats to target holding areas in rivers disrupts fish that are seeking refuge during high water conditions. These areas, which were once inaccessible to fishermen from shore, now face significant pressure. Boats can disturb the fish's natural behavior, adding stress and potentially reducing their ability to continue upstream migration. This disruption, combined with the risks of catch-and-release mortality, can negatively impact already struggling king salmon stocks. Protecting these refuge areas is critical to ensuring the sustainability of the fish and maintaining healthy escapement levels.

Submitted by: Larion Kuzmin

Community of Residence: Homer, Alaska

Comment:

My name is Larion Kuzmin, and I support Proposal 69. More and more people are starting to use boats to fish the Chitina area, and I believe stronger restrictions are needed before this trend gets out of hand. Increased boat use can disrupt fish behavior, lead to overharvest, and put additional pressure on the resource. Implementing these restrictions now will help ensure the sustainability of the fishery for future generations.

Submitted by: Larion Kuzmin

Community of Residence: Homer, Alaska

Comment:

My name is Larion Kuzmin, and I am a Prince William Sound drift gillnetter. I am writing to express my support for Proposal 56 and 57.

A dual-permit operation would greatly benefit fishermen, especially in today's economic climate where the cost of living and operational expenses are climbing rapidly while fish prices remain stagnant. By allowing fishermen to hold two permits, they could increase their harvest capacity, leading to greater efficiency and higher overall earnings. This added flexibility would help offset rising costs for fuel, gear, and maintenance, making it easier for fishermen to sustain their livelihoods and remain competitive in an industry facing constant financial pressures.

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin, and I support Proposals 14, 15, 16, and 17.

The Prince William Sound trawl fishery needs more restrictions due to its significant bycatch issues and sea floor destruction. Trawling gear often causes substantial damage to the sea floor, disrupting fragile habitats and negatively affecting marine ecosystems. The fact that bottom-dwelling species like rockfish are often caught in trawl nets further demonstrates the gear's impact on the ocean floor. Stricter regulations are necessary to protect marine life and the health of our ocean ecosystems, ensuring sustainable fishing practices for the future.

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is larion kuzmin and I oppose proposal 5 and 7.

Good Evening esteemed members of the board,

As a 4th generation gill net commercial fisherman with a lifelong connection to the Copper River and Prince William Sound areas, I have dedicated myself to the preservation and sustainability of Alaska's fisheries. Three of my generations fished in the Copper River District the other in Cook Inlet. Becoming a captain at the young age of 17 with the encouragement and approval of the State of Alaska DCCED office. I have spent the last 8 years navigating the waters of the Sound, gaining valuable experience and insights along the way. I also build sport fishing, charter, and transportation vessels during the winter. Most of which end up in Prince William Sound and the Gulf of Alaska. I bring a unique perspective to the table.

I am writing to you today with a sense of deep concern regarding proposals 51, 52, and 53. As a member of the commercial fishing industry, I feel compelled to highlight the potential detrimental impact these proposals could have on the livelihoods of our hardworking fishermen.

The commercial fishing fleet is already facing significant challenges, with closures and difficult years becoming all too common. These proposals, if implemented, have the potential to deal a crippling blow to the entire fleet, pushing many fishermen into financial distress and uncertainty. As the state of Alaska actively encourages young individuals to enter the fishery and invest heavily in their futures, it is crucial that we support and nurture these new entrants rather than jeopardize their prospects.

Voting in favor of these proposals could result in a cascade of payment deferrals to the State of Alaska Division of Investments and financial difficulties for many within the industry. The repercussions would not only be felt by individual fishermen and the State of Alaska but also by entire communities and families that rely on the success of the commercial fishing sector for their well-being.

I implore you to consider the long-term ramifications of these proposals and the broader implications for the sustainability of the commercial fishing industry. It is in the best interests of all stakeholders to reject proposals 51, 52, and 53, and instead, work towards solutions that support the growth and prosperity of our fishermen and their communities.

Thank you for your time and consideration.

Other proposals I oppose:

48, 58, 59, 63

Maksim Kuzmin

Submitted by: Maxim Kuzmin

Community of Residence: Homer

Comment:

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

0

Submitted by: Maxim Kuzmin

Community of Residence: Wasilla

Comment:

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

PC338

Submitted by: Philip Kuzmin

Community of Residence: Wasilla

Comment:

I oppose 5,7,51,52,52

PC339

Submitted by: Polagia Kuzmin

Community of Residence: Homer

Comment:

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data needs to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

PC340

Submitted by: Romil Kuzmin

Community of Residence: Wasilla

Comment:

I support them because times have changed draggers have been destroying the ocean there's a lot that needs to be done and I know it can be done in one day

As for when you're catching halibut sablefish should be open too that way there's less commute less fuel less emission better for the environment less gear loss

I do commercial fishing construction and sport fishing in Prince William sound has been in a very high decline on halibut sablefish and rock Fish due to draggers I have cruised behind 1 one time and you can almost walk on rock Fish A lot of them are shakers

PC341

Submitted by: Zina Kuzmin

Community of Residence: Homer and Cordova

Comment:

Proposal 51:

I strongly oppose this proposal. I believe that counting solely on to date sonar count is an insufficient way to gather data on run strength. The commercial fishing fleet is also used to determine how strong the run will be. By the time the fish hit the sonar there is a large time gap from the ocean to the sonar. By reducing commercial salmon fishing opportunity in the copper river district we run the risk of over escaping the copper river run.

Proposal 52:

I oppose Proposal 52

Being shut down until daily fish passage is met at the Miles lake sonar reaches daily management objective is an insufficient way to gather data. Most of the time the sonars are not gathering data due to ice. When the sonars are operational there is a large time gap from the ocean where the commercial fleet fishes to the sonar. Other forms of data need to be gathered in order to get a proper assessment of the run itself. Such as fleet delivery numbers and historical data.

PC342

Submitted by: Kallistrat Kuzmin

Community of Residence: Delta junction

Comment:

I oppose proposals

5, 7, 51, 52, 53 and 25

I support proposals

76,15,17,22,43,49,56,57,68,69 and 4

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is larion kuzmin and I support proposal 76.

Submitted by: Larion Kuzmin

Community of Residence: Homer alaska

Comment:

My name is Larion Kuzmin and I support proposal 79 and 81.

Submitted by: Vladimir Kuzmin

Community of Residence: Delta jct

Comment:

I support proposals 76, 15, 12, 22, 43, 49, 56, 57, 68, 69, 4, 19, 20....

I oppose proposals 5, 7, 51, 52, 53, 25....

Submitted by: Alexis Kwachka

Community of Residence: Kodiak

Comment:

Chairman and members of the Board of Fish,

I would like to speak in opposition to proposals 73 and 74 and any other permit stacking proposals that come before you.

Owner operated fisheries are the backbone of Alaskan coastal communities. Allowing 1 owner to operate 2 permits is a bad president for Alaska. We already are facing the greying of the fleet further exacerbating a negative will not alleviate this identified issue. Permit stacking can appear benign but it's not, it advantages established business plans over new entrants and further disadvantages new entrants from entering the fishery.

What are the criteria of success?

Who are the winners?

Who are the losers?

Lower 48 versus Alaska?

Who will even measure this?

I fish in several fisheries that this would be advantages to my 39 yr business plan but I say clearly NO.

Fishing is a struggle in the best of times do not put barriers in front of new business plans.

Ones failure is another opportunity.

Alexis Kwachka Kodiak.

Submitted by: Dan LaBrosse

Community of Residence: Fairbanks

Comment:

I'm a firm beleiver that our natural resouces belong to all Alaskan's equally. It is therefore in the best interest of all Alaskans that we support the use of these resources to benefit the most Alaskans by providing a solid subsistence resource to feed our families. However like most governed boards it appears that the most emphasis here is for the benefits of the much fewer commerical fishermen that look to make the greatest profits. This does not serve the majority of Alaskans very well at all! We need to prioritized susitence and use of our resources to benefifit the most Alaskans as possible, not the comercial interest of only a few.

Submitted by: Todd Ladd

Community of Residence: Cordova

Comment:

I oppose proposal 51,52,53. Cutting time will only do negative things for the community. Fish will continue to swim up river every day even during commercial fishing periods.

Submitted by: Julie Lageson

Community of Residence: Fairbanks, AK

Comment:

I understand that our fishing industry is incredibly important to both our Alaskan residents and the world, however, please do not restrict our citizens as regards subsistence fishing. We have to prioritize feeding our own people.

I oppose proposals 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69 and 71. I support proposals 48, 51, 52, 53, 58, 59, and 70.

Thank you for your thoughtful consideration.

Submitted by: Nathan Lake

Community of Residence: Hooper Bay

Comment:

I strongly oppose the trawlers fishing in Alaska waters! While we aren't able to fish and subsist for our natural foods due to low return salmon numbers, trawlers are able to slaughter and waste our valuable resource of food security. And we are treated like criminals just for trying to feed our families and elders of our communities by Alaska Fish and Game authorities. We are being oppressed

Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Anchorage, AK 99811-5526

November 26, 2024

Re: **Oppose** Proposals 14, 15, 16, and 17 – PWS Pollock Fishery

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Rob Langdon, and I am the captain of the F/V Evie Grace. I have been fishing in Alaska for the past 43 years, and I currently reside in Kodiak, Alaska. I am writing to formally oppose Proposal 14, 15, 16, and 17, which would lead to the closure of the Prince William Sound (PWS) pelagic trawl fishery.

I have fished in PWS for the past 7 years and have been tendering in the Sound for 11 years. Throughout this time, I have come to recognize the immense value of this fishery to the region, and I am deeply concerned about the negative impacts these proposals would have on the industry and coastal communities. The PWS pelagic trawl fishery is one of the first fisheries of the year, providing an essential economic lifeline for many Alaskan fishermen after the slower winter months. Its closure would cause significant hardship for the industry and those who depend on it, including my own operation.

This fishery is highly managed and closely monitored to ensure sustainability. It requires ongoing communication between the fleet and managers, mandatory check-in and check-out procedures before entering or leaving a management section, daily catch reporting, and limits on the number of vessels allowed to fish in the Sound at any given time. These regulations ensure the fishery's health and sustainability. As such, I believe that the PWS pelagic trawl fishery should remain open.

Furthermore, the Alaska Department of Fish and Game (ADF&G) staff, who have years of expertise in managing fisheries in the region, also oppose these proposals. The department has demonstrated its ability to effectively manage the fishery through mechanisms such as Emergency Orders to adjust bycatch limits and the deployment of observers when available. I trust that ADF&G can continue to manage this fishery responsibly.

The Alaska seafood industry is in a state of continued crisis, with many small vessel businesses, including mine, struggling due to historically low ex-vessel prices across multiple fisheries. I have been forced to cut costs and delay capital investments and maintenance to stay afloat. Losing the PWS pelagic trawl fishery would be devastating to my livelihood, as well as to the many others who rely on this resource.

I am committed to ensuring that future generations of Alaskan fishermen will be able to continue fishing in the Sound, supporting their families, stabilizing food security in Alaska, and contributing to the economic strength of our coastal communities. I strongly urge the Board of Fisheries to oppose Proposals 14, 15, 16, and 17 and to keep the PWS pelagic trawl fishery open.

Sincerely,



Rob Landon
Captain, F/V Evie Grace

Submitted by: Peter Langworthy

Community of Residence: Fairbanks

Comment:

Responding to survey

Submitted by: Christianne Lapierre

Community of Residence: Mat-Su Borough

Comment:

Prop 68, 69, 71 - oppose

Are you kidding about removing boats from personal use fishing? Not everyone can crawl down a cliff or back up. Not everyone has the means to get down an ATV trail. Not everyone has the physical ability to dip net from the shore. Can you imagine all of the fighting that is going to ensue when the shore fishing is overwhelmed and over crowded? Not everyone can afford a boat. What happens when all of the people who normally boat fish clash and compete with those who fish from the shore? People rely on these fish to feed their families. It is going to get ugly when people can't feed their families. Wait till someone gets pushed into the river . Did anyone put any long term thought into this?

Prop 60 and 61 - oppose

Again, people rely on these fish to feed their families. How do you think people are going to feed their families if you reduce the amount of fish they can catch. This is just going to lead to poaching when people go hungry.

Prop 58 and 59 - Support

November 26, 2024

RE: Letter of Support for Proposal 16 - Close the Prince William Sound pelagic trawl fishery – Submitted by The Chenega IRA Council

I am writing to express my strong support for Proposal 16, which seeks to close the pelagic trawl fishery in Prince William Sound (PWS). This action is critical to ensuring the long-term sustainability of PWS fish species and habitats.

The current lack of oversight and transparency within the pelagic trawl fishery is deeply concerning. Unlike other fisheries, the trawl fishery operates without onboard observers or adequate monitoring by Alaska Department of Fish and Game (ADF&G) employees to accurately account for bycatch. This gap in oversight undermines public trust and limits our ability to make informed decisions about resource management. I urge the Board to pass Proposal 17, which would help address these critical shortcomings. However, Proposal 16 provides the most comprehensive and immediate solution by fully closing the fishery to protect PWS's unique ecosystem.

Prince William Sound is home to a diverse array of fish species that are vital not only to the region's ecological balance but also to the cultural, subsistence, and economic well-being of Alaskans. Closing the pelagic trawl fishery under Proposal 16 is the most protective measure we can take to safeguard these invaluable resources. Allowing this fishery to continue jeopardizes critical habitats and threatens species that depend on the Sound's fragile ecosystems.

The bycatch of rockfish, including shortraker and roughage rockfish, highlights the destructive nature of pelagic trawl nets. These species are not pelagic; they are demersal, spending most of their lives on the ocean floor. The presence of these long-lived fish in trawl bycatch demonstrates that trawl nets are frequently fishing the bottom, with devastating consequences for these slow-reproducing species. Some shortraker rockfish can live over 120 years, while rougheye rockfish can reach 250 years of age. Their removal from the ecosystem is not only unacceptable but also unsustainable.

The bycatch of Chinook salmon in the pelagic trawl fishery is equally concerning. Over the past decade, Chinook salmon populations have experienced significant declines, leading to severe restrictions or closures on sport, subsistence, and commercial fisheries statewide. It is unacceptable to allow any bycatch of this iconic species, especially when conservation and recovery efforts should be our top priority.

Proposal 16 represents a necessary step to protect Prince William Sound's fish and habitat from the damaging impacts of the pelagic trawl fishery. While Proposal 17 addresses some oversight issues, closing the fishery entirely is the most effective and protective measure. By passing Proposal 16, the Board will demonstrate its commitment to preserving the ecological integrity of Prince William Sound and safeguarding the future of Alaska's fisheries for generations to come.

Thank you for your time and consideration. **I urge you to pass Proposal 16 to protect the invaluable resources of Prince William Sound.**

Krystal Lapp

[REDACTED]
Fairbanks, Alaska

November 26, 2024

RE: Letter of Support for Proposal 15 - Modify bycatch limits in the Prince William Sound pelagic trawl fishery – Submitted by The Chenega IRA Council

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to submit testimony regarding Proposal 15, which seeks to modify bycatch limits in the Prince William Sound (PWS) pelagic trawl fishery. I strongly support this proposal as it provides critical improvements to current management practices that will help protect PWS fish species and their habitats.

Under the existing regulations, bycatch limits are set at no more than five percent of the total round weight of the walleye pollock harvest. While this percentage-based cap seems reasonable on the surface, it can unintentionally allow bycatch to increase as the Guideline Harvest Level (GHL) for pollock increases. This creates a scenario where higher pollock harvests lead to greater amounts of bycatch, putting vulnerable fish species and the broader ecosystem at unnecessary risk.

By implementing a fixed bycatch cap in pounds, as proposed, this regulation would provide a more consistent and precautionary approach to bycatch management. It ensures that bycatch amounts remain independent of increases in the total pollock harvest, helping to reduce overall bycatch levels and better protect PWS resources.

Protecting Vulnerable Species: Bycatch in the pelagic trawl fishery often includes Chinook salmon and long-lived rockfish species like shortraker and rougheye, which are under significant conservation pressure. Establishing a fixed bycatch cap will help protect these vulnerable species from overexploitation.

Supporting Sustainability: A fixed bycatch cap ensures bycatch levels remain low regardless of increased harvests, aligning with Alaska's commitment to sustainable fisheries and reducing waste.

Enhancing Transparency and Accountability: Proposal 15 also calls for bycatch to be brought back to port and surrendered to ADF&G. This requirement would improve transparency and accountability in the fishery, allowing for better data collection, enforcement, and oversight. It ensures that bycatch is not discarded at sea, which can obscure the true impacts of the fishery on non-target species.

Proposal 15 represents a pragmatic and forward-thinking approach to managing bycatch in the PWS pelagic trawl fishery. By setting a fixed bycatch cap and requiring all bycatch to be surrendered to ADF&G, this proposal prioritizes the health of PWS ecosystems, supports sustainable fishery practices, and upholds Alaska's reputation as a global leader in responsible fisheries management.

I urge the Board of Fisheries to adopt Proposal 15 to ensure the long-term health and sustainability of PWS resources for the benefit of all Alaskans.

Thank you for your time and consideration.

Krystal Lapp

[REDACTED]
Fairbanks, Alaska

November 26, 2024

RE: Letter of Support for Proposal 17 - Establish observer requirements in the Prince William Sound pelagic trawl fishery– Submitted by The Chenega IRA Council

Dear Members of the Alaska Board of Fisheries,

Thank you for the opportunity to provide testimony in support of the proposal to establish observer requirements in the Prince William Sound (PWS) pelagic trawl fishery. This proposal is a necessary step toward ensuring the sustainable management of the fishery and maintaining public trust in the integrity of its operations.

The PWS walleye pollock trawl fishery is the only trawl fishery in Alaska with 0% observer coverage, relying solely on self-reporting by the user group. This lack of independent oversight raises significant concerns about the accuracy of bycatch reporting and the potential for overfishing. Without verification, it is impossible to ensure compliance with regulations or to assess the true impact of the fishery on non-target species and the broader ecosystem.

Requiring 100% electronic observation and 50% physical onboard observer coverage, as outlined in this proposal, would provide the verification and accountability necessary to uphold the standards of sustainable fisheries management.

Accurate Bycatch Monitoring: Independent observation will ensure accurate reporting of bycatch, including vulnerable species such as Chinook salmon and rockfish. This data is essential for making informed management decisions and for protecting species already under significant conservation pressure.

Prevention of Overfishing: Observer requirements will deter illegal, unreported, and unregulated fishing practices, helping to prevent overfishing and ensure the long-term sustainability of PWS fisheries.

Increased Transparency and Public Trust: Independent oversight through electronic and physical observation enhances transparency and accountability in the fishery, fostering public confidence in its management. This is particularly important in a fishery that has operated without any observer coverage to date.

Establishing observer requirements in the Prince William Sound pelagic trawl fishery is a vital step toward ensuring the integrity, sustainability, and transparency of this fishery. I strongly urge the Board to adopt this proposal to safeguard PWS fish populations and habitats for future generations.

Thank you for your time and consideration.

Krystal Lapp

[REDACTED]
Fairbanks, Alaska

Submitted by: Denny Lars

Community of Residence: Hillsboro

Comment:

I absolutely support the closure of the wasteful and unsustainable trawl fishery in Prince William Sound,Proposals 14, 15 &16.

Submitted by: Margie Larson

Community of Residence: Russian Mission

Comment:

Stop the Trawlers! Stop the fisherman and the companies for taking or wasting our fish!

Submitted by: Kirk Lavender

Community of Residence: Oregon

Comment:

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the destructive and unsustainable commercial PWS pollock trawl fishery as specified in Proposals 14 and 16. If the Board fails to pass either of these Proposals, I would highly encourage them to consider measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.



Nov 25, 2024

Dear Members of the Alaska Board of Fisheries,

I am writing on behalf of Lazy Otter Charters, We are a water transportation business operating in Whittier, Alaska. We operate water taxi in and around the Sound as well as offer sightseeing to the visitor industry. We have worked with Prince William Sound Aquaculture Corporation (PWSAC) for many years and believe they play a very important role in healthy fisheries in our area. Because of our role in the transport and visitor industry our business is intertwined with the health and sustainability of the fisheries in Prince William Sound, and we are concerned about the impacts of Proposal 78 on the region's hatchery operations, specifically those managed by PWSAC.

Critical Role of Hatcheries: PWSAC plays a pivotal role in supporting sustainable harvests that benefit all user groups across the Sound, including commercial, recreational, and subsistence fishermen. The proposed 25% reduction in pink and chum salmon production poses a significant threat to these groups by undermining the stability and sustainability of the salmon stocks that are crucial for the regional economy.

Economic Impact: The stability of our local economy, particularly in communities like Whittier, is heavily reliant on the success of hatchery operations. Proposal 78 threatens this stability, potentially leading to economic downturns that could affect numerous sectors, including tourism, which relies on a healthy marine ecosystems to attract visitors.

Support for Sustainable Practices: As a company that works closely with PWSAC, we understand the importance of maintaining robust salmon populations not only for economic reasons but also for ecological balance. Reducing hatchery production risks depleting stock levels, which could lead to stricter fishing regulations and diminished tourist attraction, impacting our business in our community.

Call to Action: We urge the Board to consider the broader impacts of Proposal 78 and reject this measure. Maintaining the current levels of hatchery production is essential for preserving the health of Prince William Sound's marine ecosystems and the economic vitality of the communities that depend on them.

Eagle River, AK 99577 * Whittier, AK 99693

Lazy Otter Charters is committed to supporting sustainable fisheries management practices that ensure long-term viability and prosperity for all stakeholders in Prince William Sound. We appreciate your attention to our concerns and hope for a favorable resolution that continues to support the vital role of hatcheries in our region.

Thank you for considering our perspective on this critical issue.

Mike and Kelly Bender
Owners
Lazy Otter Charters Inc

[REDACTED], Eagle River, AK 99577 * [REDACTED], AK 99693
[REDACTED]
[REDACTED]

Submitted by: Jason Lee

Community of Residence: Cordova

Comment:

I am opposed to proposals 51,52 and 53. Our area biologist has all the tools to manage this 'mixed stock' fishery and does so well. He has a good track record despite many challenging and diverse circumstances of runs and run timings and his experience at this position is invaluable. These proposals would limit his ability to manage the stocks in accordance with maximum yield principles. For instance in years of high abundance of sockeye, these proposals would violate those principles and over escapement would cause undesirable boom and bust salmon stock returns.

Sincerely,

Jason Lee

Submitted by: Jason Lee

Community of Residence: Cordova

Comment:

The commercial fleet is an invaluable resource management tool that takes the 'excess' numbers of fish. Quite reliably the inRiver goal is met and exceeded, which provides consistent escapement numbers. If the fleet is not allowed to fish 'as needed' on the early run, drastic overescapement will occur. And the run will suffer. Also our incomes and communities and way of life will suffer. The key to remember in regards to these proposals is that physical river and ocean conditions, climate, and run timing and strengths vary so much year to year that a proposal such as these would be so harmful and detrimental to our communities and the stocks. Jeremy has all the tools he needs to manage these stocks in season with large variance from year to year. In years of large abundance, hundreds of thousands of sockeye go up the river in a matter of days. In years such as these, having a regular schedule of two 12 hour periods a week is absolutely imperative.

Sincerely, Jason Lee

Submitted by: Ellen Leisner

Community of Residence: Palmer

Comment:

My family has been participating in the personal use fishery for over 20 years. 44 there is no reason that more than the legal amount of gill net gear be allowed. 45 The subsistence fishery should not be opened in the closed area, this would infringe upon the personal use fishery. I don't have the time to comment on each of these proposals. I am pro personal use fishing. Many of these proposals are pro commercial fishery. Many Alaskans depend on personal use fishing.

OPPOSE Proposals 44,45,49,50,55,

56,57,60,61,63,64, 67,68,69,71

Support proposals: 48,51,52,53,58,59,70

I am opposed to following proposals:

44-47; 49-57; 60-69; and 71

My wife and I have lived in Alaska for the past 43 years. For the majority of that time, while working, we lived in various locations in Southeast Alaska, Kodiak Island area and also Cordova. Without exception in these places we were able to fulfill our subsistence needs for salmon by sport fishing in streams or with a small boat in saltwater. Since retiring and moving to Anchorage to be near our children and grandchildren we have found it extremely difficult and frustrating to harvest enough salmon for our needs.

The last 2 years we have participated in the Chitina dipnet fishery with a charter boat service, and we are very happy and appreciative of the opportunity that this subsistence fishery provides. In just seeing the families that are utilizing this resource both from boats and shore, you understand how important it is to Alaskans. I am too old to be dangling from cliffs with a dipnet, so the charter service allows me to participate. I believe that fish and wildlife in Alaska should be for general public first with the excess being allocated to the commercial ventures.

We appreciate the effort the ADFG does in maintaining the salmon runs and hope to be able to get our subsistence fish in the Chitina area for years to come.

Norman Lepschat

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am a 4th generation Area E commercial fishermen.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Eric Lian

A black rectangular redaction box covering the signature of Eric Lian.

Cordova

Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.:
SUPPORT this proposal with CDFU

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.: OPPOSE this proposal with CDFU

Proposal 58 - Amend the Copper River King Salmon Management Plan.: OPPOSE this proposal with CDFU

Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.: OPPOSE this proposal with CDFU

Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.:
OPPOSE this proposal with CDFU

Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.: SUPPORT this proposal with CDFU

Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.: OPPOSE this proposal with CDFU

Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.: OPPOSE this proposal with CDFU

Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.:
SUPPORT this proposal with CDFU

Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.: SUPPORT this proposal with CDFU

Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.:
SUPPORT this proposal with CDFU

November 24, 2024


Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am from Girdwood, Alaska, and sport and personal use fisheries are how I interact with the salmon fishery. Alaska's salmon hatcheries have benefited my family by putting food on our table, and when we have an abundance, we share with others in our community. If pink and chum salmon are reduced, more pressure would be put on other species. Please review the following reason why the Board should oppose and reject Proposal 78:

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sincerely,
Kris Lillemo



Seward, Alaska

November 24, 2024


Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am from Seward, Alaska, and sport and personal use fisheries are how I interact with the salmon fishery. I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. Alaska's salmon hatcheries have benefited my family by putting food on our table, and when we have an abundance, we share with others in our community. If pink and chum salmon are reduced, more pressure would be put on other species. Please review the following reason why the Board should oppose and reject Proposal 78:

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sincerely,
Kris Lillemo


Seward, Alaska

November 24, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am from Anacortes, Washington, and I am tied to seining. Without the hatchery program in PWS, the seine fleet would be non-existent. Hatcheries are the mainstay of well over 200 seine boats. Proposal 78 would directly impact every fisher. I can't imagine taking a 25% cut in my gross income. It's tough enough right now to find a crew, and with this proposal, it would be nearly impossible.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both

major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,
Joe Lindholm

A solid black rectangular box used to redact the signature of Joe Lindholm.

Anacortes, Washington

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fishermen.

I have participated in the salmon drift gillnet fishery in Area E since 1978. I have participated in the halibut longline fishery in Area 3A since 1997. I have also served on many fishery-related boards over the years, including PWSAC, Copper River/PWS Marketing Association, and the Copper River Fishermen's Cooperative.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

William Lindow

A solid black rectangular box used to redact the signature of William Lindow.

Cordova

Proposal 1 - Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.: OPPOSE this proposal with CDFU

Proposal 2 - Reopen waters closed to the harvest of groundfish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 3 - Modify Prince William Sound groundfish pot specifications.: SUPPORT this proposal with CDFU

Proposal 5 - Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.: OPPOSE this proposal with CDFU

Proposal 6 - Allow for release of rockfish in mechanical jig and hand troll fisheries.: SUPPORT this proposal with CDFU

Proposal 7 - Establish gear specifications for directed lingcod fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 8 - Modify the Prince William Sound pacific cod fishery guideline harvest level.: SUPPORT this proposal with CDFU

Proposal 9 - Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.: SUPPORT this proposal with CDFU

Proposal 10 - Modify pot limit in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 13 - Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.: SUPPORT this proposal with CDFU

Proposal 19 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 20 - Modify the commercial fishing season for sablefish in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 22 - Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 23 - Prohibit the retention of sablefish from state waters.: SUPPORT this proposal with CDFU

Proposal 25 - Establish a personal use sablefish fishery in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 26 - Establish a Prince William Sound groundfish personal use fishery.: OPPOSE this proposal with CDFU

Proposal 27 - Modify rockfish bag and possession limits.: SUPPORT this proposal with CDFU

Proposal 28 - Modify the rockfish area, bag and possession limit.: OPPOSE this proposal with CDFU

Proposal 29 - Create additional provisions for yelloweye rockfish management.: SUPPORT this proposal with CDFU

Proposal 31 - Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.: SUPPORT this proposal with CDFU

Proposal 32 - Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 33 - Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.: OPPOSE this proposal with CDFU

Proposal 34 - Repeal the Registration Area E Tanner crab harvest strategy.: SUPPORT this proposal with CDFU

Proposal 35 - Modify the harvest strategy for Prince William Sound Tanner crab.: SUPPORT this proposal with CDFU

Proposal 36 - Increase the pot limit in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 37 - Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.: SUPPORT this proposal with CDFU

Proposal 38 - Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.: SUPPORT this proposal with CDFU

Proposal 39 - Establish season dates for a commercial golden king crab fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 40 - Adopt a harvest strategy for golden king crab in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 42 - Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.: OPPOSE this proposal with CDFU

Proposal 43 - Establish a directed octopus fishery in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 46 - Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.: SUPPORT this proposal with CDFU

Proposal 47 - Require inseason reporting in subsistence and personal use fisheries.: SUPPORT this proposal with CDFU

Proposal 48 - Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.: OPPOSE this proposal with CDFU

Proposal 49 - Prohibit transport services in the Glennallen Subdistrict.: SUPPORT this proposal with CDFU

Proposal 51 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 52 - Reduce commercial salmon fishing opportunity in the Copper River District.: OPPOSE this proposal with CDFU

Proposal 53 - Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.: OPPOSE this proposal with CDFU

Proposal 55 - Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.: SUPPORT this proposal with CDFU

Proposal 58 - Amend the Copper River King Salmon Management Plan.: OPPOSE this proposal with CDFU

Proposal 59 - Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.: OPPOSE this proposal with CDFU

Proposal 60 - Modify the annual limit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 61 - Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 62 - Allow inseason adjustment of the Copper River personal use maximum harvest level.: SUPPORT this proposal with CDFU

Proposal 63 - Amend the opening date of the Chitina Subdistrict personal use fishery.: OPPOSE this proposal with CDFU

Proposal 64 - Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.: SUPPORT this proposal with CDFU

Proposal 65 - Require a weekly permit and inseason reporting in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 66 - Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.: SUPPORT this proposal with CDFU

Proposal 67 - Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 68 - Prohibit dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 69 - Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 70 - Extend the lower boundary of the Chitina Subdistrict.: OPPOSE this proposal with CDFU

Proposal 71 - Prohibit guiding in the Chitina Subdistrict.: SUPPORT this proposal with CDFU

Proposal 72 - Close sport fishing for salmon based on water temperature in the Gulkana River.: SUPPORT this proposal with CDFU

Proposal 78 - Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.: OPPOSE this proposal with CDFU

Proposal 79 - Close Main Bay to all fishing during hatchery cost recovery operations.: SUPPORT this proposal with CDFU

Proposal 80 - Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.: SUPPORT this proposal with CDFU

Proposal 81 - Modify the area open to sport fishing near the Main Bay Hatchery.: SUPPORT this proposal with CDFU

Proposal 83 - Allow a resident sport angler to use two rods when fishing for salmon.: OPPOSE this proposal with CDFU

Proposal 84 - Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.: SUPPORT this proposal with CDFU

Proposal 85 - Modify the bag and possession limit for coho salmon.: OPPOSE this proposal with CDFU

Proposal 86 - Modify the sport fishing area and season dates in Ibeck Creek.: SUPPORT this proposal with CDFU

Proposal 87 - Modify the sport fishing area and season in a Copper River Delta system.: SUPPORT this proposal with CDFU

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

Proposal 96 - Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.: SUPPORT this proposal with CDFU

Proposal 97 - Reduce the minimum herring spawning biomass threshold.: SUPPORT this proposal with CDFU

Proposal 98 - Align Prince William Sound herring and salmon management area descriptions.: SUPPORT this proposal with CDFU

Proposal 99 - Define commercial herring fishery districts in Prince William Sound.: SUPPORT this proposal with CDFU

Proposal 100 - Adopt a Kayak Island District herring management plan.: SUPPORT this proposal with CDFU

Proposal 102 - Allow commercial fishery permit holders to harvest herring for the own use as bait.: SUPPORT this proposal with CDFU

Submitted by: Robert Linville , Dutch Lady Fisheries LLC

Community of Residence: Seward

Comment:

Proposal #78 Comments:

Dear Alaska Board of Fish

I urge each of you to reject this proposal flat out. Our industry has been through a couple hard years but survives ready for the 2025 season. This proposal threatens our ability to survive. Please consider the following points as you deliberate Proposal #78:

- 1.) Cutting off Alaska's hatchery program will not even diminish the ultimate number of hatchery grown pink salmon fry released into the North Pacific ocean each year. Russia continues to expand its hatchery program with no end in sight. Ask the proposer to initiate an international agreement to serve the purpose he seeks.
- 2.) The hypothetical justification will not in real life bring back even one additional king salmon. However, it will seriously damage the commercial fishing industry from Ketchikan to Kodiak.
- 3.) That damage extends to the sport fishery as it also consists of hatchery returns.

Thanks for your consideration.

Bob Linville

Seward, AK

Submitted by: Robert Linville IV

Community of Residence: Cordova

Comment:

56

opposed. This proposal is meant to further opportunity for already established permit holders and incentivize the purchase of permits to effectively “buy that boat off the point”

When this was most recently done in the pws seine fleet the crew benefit mentioned was an added 100k to the permit price inside the week of the board meetings. As you might imagine this did not help crew or any young fisherman trying to buy in. I would like to see the same access I enjoyed to this fishery extended to the next generation.

73

Opposed

Permit stacking or incentivizing the fleet to buyback permits will just further put crew and new entrants at a disadvantage. The last “stacking” proposal was flaunted as “good for crew” when in reality permit prices jumped 100k immediately and largely existing permit holders bought permits and put them in crews names season by season with no added share. This is just a continuation of the greed displayed in the first proposal.

PC367

Submitted by: Keith Lipse

Community of Residence: Big Lake

Comment:

Sorry for not reading the proposals just found about the SOA changing the way I have been getting food for my family. Leave things alone shut down the boats in salt water before residents. personal use fish should have preference over out of staters.

PC368

Submitted by: David Lisov

Community of Residence: Copper river drift gillnet fisherman

Comment:

I oppose proposals 51, 52, and 53.

PC368

Submitted by: David Lisov

Community of Residence: Copper river drift gilnet

Comment:

I oppose proposal 5, 7, and support 76

PC369

Submitted by: Teal Lohse

Community of Residence: Cordova

Comment:

I am commenting on proposal 7.

I oppose this proposal.

Since 2012 the guideline harvest level (ghl) for lingcod in the inside district has been set at 7,300 pounds. Since then the average yearly harvest has been 3694 pounds. With only two yrs exceeding or approaching the ghl. (In 2019 the harvest was 7,388 and in 2018 harvest was 6,688lbs). The two yrs prior to that were 2017 with 460 lbs

and 2016 at 404 lbs. The two yrs after that were 2020 at 3052 lbs and 2021 at 2,341 lbs. My point is the fishery has been open from the season start of july 1st till the end at dec 31st Almost every yr and so there has been opportunity for a person who wanted to target lingcod using jig gear without closing down the fishermen catching them with longline gear. In the future if the ghl starts getting consistently caught and opportunity starts to get limited this proposal could be revisited, as of now it appears a non issue and i believe regulations should remain as they currently are.

PC370

Submitted by: Trae Lohse

Community of Residence: Cordova

Comment:

Opposed to Proposal 73/74 I would draw attention to the fact that during the 2021 BOF a big argument heard time and again for being able to fish two permits on a seiner was that it would help new entrants to the fishery get a start as a permit holding crew member. These proposals would have the opposite result of that supposed intent.

Submitted by: Tyee Lohse

Community of Residence: Cordova

Comment:

I oppose proposal 44, I don't believe more gear is necessary and could result in catching too many fish. I oppose proposal 45, in the area that skiff fish the inside is open already. I support 46 and 47, I believe in season reporting could be an important management tool. I oppose 48, this was put in place for a reason, guiding has no place in subsistence and sets a precedent. I oppose 51, this does not align with Adfandg management which has been working. I oppose 52. I oppose 53. I oppose 56, I don't support permit stacking it eliminates opportunity and makes less people more money. I oppose 57, I want more opportunity for young fisherman. I support 60, I think this is a more reasonable limit. I support 67, I think removing king salmon from the water increases mortality, I oppose 70, the lower boundary was already extended last cycle we can't extend this every new cycle. I support 71. I oppose 83, one rod is sufficient for 1 angler. I support 84, if guiding for fish you should not be fishing

November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am a born and raised Cordovan, I sport fish, subsistence fish, and commercial fish. My Family lives on fish in the winter, we make a living fishing. Salmon hatcheries in Alaska provide a huge economic boost to the state, they provide increased sport and subsistence opportunities for all user groups. They alleviate fishing pressure on wild stocks. It is very important to maintain current hatchery production levels. I catch hatchery fish to sell. They are a big portion of my livelihood, and also to feed my family. This would affect my business economically, It would also affect the crew that works for me.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a

strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

Tyee Lohse

A solid black rectangular box used to redact the signature of Tyee Lohse.

Cordova, Alaska

Submitted by: Sandra Loomis

Community of Residence: Talkeetna

Comment:

I Oppose Alaska Board of Fisheries proposals #59, #60, #61 & #65 to reduce the opportunities for Alaska residents to gather salmon to eat.

At the Chitina Personal Use fishery Alaskans harvest less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Sharing returning salmon among Alaskans is the law under state abundance-based management.

I Oppose Proposal #65 submitted by the Athna Intertribal Fish and Wildlife Committee. Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery on the Copper River.

I support#'s: 50, 55, 62, 69 and 63.

Thank you,

Sandra Loomis



Talkeetna. AK. 99676

November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I'm a 3rd generation commercial fisherman. I am a seine boat captain and tender owner. My family helped to create the hatcheries in the Prince William Sound and would be economically devastated if they were to go away.

Proposal 78 is a financial cleaver to an already desperate industry. I know several fisherman who are living on loans and temporary funds, just hoping to make it to summer 2025. If the egg take goes down 25% it will fundamentally change the ability to make a living wage in the fishery. If the egg take goes down 25%, unfortunately the operating expenses don't go down 25% in turn, so at a minimum there would be a relative increase in the total amount of cost recovery needed to support the hatcheries.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

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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,

Alexander Lopez

[REDACTED]

Valdez, Alaska

November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I am a commercial and sport fisherman. Three generations of my family have benefited tremendously from the hatchery system in Prince William Sound. My family would be decimated by this. WE've always prided ourselves in the amazing sustainability model of the hatchery systems, and all of our livelihoods rely on it.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable

by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,

Thomas Lopez

[REDACTED]

Valdez, Alaska

Submitted by: Jeffrey Loughrey

Community of Residence: Anchorage

Comment:

By Jeffrey L. Loughrey

Oppose: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72

Support: 48, 58, 59, 70

I have read the proposals, and this makes me sick. I came to Alaska 40 years ago for the hunting and fishing. It has become extremely difficult for me to recreate and feed my family with the opportunities remaining. Now at 64 my legs are not strong enough to safely fish the cliffs of the copper, and using my 21' jetboat myself just scares me. We used a charter service this last year which enabled me to continue participating in this fishery. Now these proposals are nothing more than the commercial guys wanting even more of a disproportionate share. Alaska should be for Alaskans benefiting as many as possible with the limited resources. The split between commercial and personal use needs to be balanced. The Copper commercial guys take 88% of the sockeyes and 98% of the Chinook. And now they want more? Thats just wrong. And selfish.

Jeff

Submitted by: Doug Luiten

Community of Residence: Anchorage

Comment:

I strongly urge you to adopt proposal 51 to ensure healthy sustainable returns of salmon to the Copper River. Our family has utilized fish from this area since the '60's and it is too valuable a resource to perish. Please do not let this fishery go by the wayside , much like the runs in the Columbia.

Submitted by: Taleen Lundale

Community of Residence: Big Lake

Comment:

I am in support of proposals 14, 15, 16 and 17 seeking action to update regulations of the Pollock trawl fishery in Prince William Sound.

Submitted by: Stephen Luther

Community of Residence: Mat-Su

Comment:

I am writing to Oppose Proposal #63 and #65 submitted by the Athna Intertribal Fish and Wildlife Committee. Currently, there are salmon abundant enough to share a very small portion of the salmon harvest with other Alaskans who choose to participate in the Personal Use fishery.

Oppose Proposal #64 submitted by the Cordova District Fisherman United to restrict Alaskan households gather salmon under both an Upper Cook Inlet personal use salmon fishery permit and a Chitina personal use permit during the same year.

Currently there is ample returning salmon to feed Alaskans in Cordova while allowing families who choose to access publicly owned salmon for family use in the Copper River drainage.

Personal Use fishery harvest is less than 10% of sockeye salmon returning to the Copper River drainage, and less than 5% of the king run. Over 500,000 sockeye and tens of thousands of kings still are reported upriver every year. Sharing salmon among Alaskans is the law within the State Constitution.

Submitted by: Josh Lyon

Community of Residence: np

Comment:

I want to see that this natural resource is well maintained but at the same time there always has to be a balance.

With the proposals of reduction of the limit to a household (proposal 60,61, and 62) this will could create a disconnection from people that actually live in the state versus people that are from out of state. People in this state live off of chitina salmon for a whole year and we don't need to reduce their yields.

As for the use of charter's in a personal dipnetter fishery I think that it is best as accessing the shores of chitina can be difficult to say the least. I oppose proposal 71 and 68 As only residents of this great State can dipnet this would create a barrier to entry to the beautiful harvest of salmon. As it takes a lot to harvest from shores of the Chitina, charters provide people an opportunity to provide for their families at a reasonable cost.

Submitted by: John MacDonald

Community of Residence: Portland, Oregon

Comment:

I would like to comment on 2 proposals -

I strongly support Proposal 5, from ADFG, that would allow the commissioner to close areas to commercial fishing with specific gear types by emergency order. Many groundfish stocks are in trouble. Without flexibility to address situations that arise during a season, unplanned lower stocks of groundfish cannot be addressed during the season. Overharvest of reduced stocks can set the harvest levels back by years, or decades with some of the longer lived groundfish.

I strongly support Proposal 14, from the Alaska Outdoor Council, to close the Alaska pollock trawl fishery in PWS unless and until the trawlers modify their gear to reduce both contact with the seafloor and the Chinook salmon bycatch is eliminated. The trawl fishery, destroys a significant amount of seafloor with every trawl. This is not good for the groundfish stocks. Chinook salmon stocks are in decline in Alaska. Sport & subsistence fishing is reduced because of bycatch.

Submitted by: Kevin Madison

Community of Residence: OREGON

Comment:

SUPPORT Proposals 14, 15, 16, and 17

I fully support CLOSURE of the destructive and unsustainable commercial PWS pollock trawl fishery as specified in Proposals 14 and 16. If the Board fails to pass either of these Proposals, I would highly encourage them to consider measures to reduce bycatch impacts and ensure greater accountability in bycatch reporting as specified by the Chenega IRA Council in Proposals 15 and 17.

Submitted by: Maya Magee

Community of Residence: Homer

Comment:

75,76,77,78. As a commercial fisherman in PWS I feel that ensuring strong hatchery runs will benefit our wild fish and fisherman.

Submitted by: Jacob Mahoney

Community of Residence: Chugiak

Comment:

I am writing to oppose proposals 63,64 and 65. The chitina personal use fishery is integral to the health of my family. Without the salmon we currently catch we wouldn't be able to afford groceries. Please oppose these proposals.

Dear Board Members. As a forty plus year veteran of commercial fishing in PWS and the Copper River, I would like to voice my support of Proposal #64, limiting the eligibility for obtaining a personal use permit to either the Copper River dip net fishery or the Cook Inlet fishery.

I take my personal use fish out of my commercial catch and rarely use more than 15-20 sockeye per season. With a family of 4 this number of fish was enough to allow for a winter of eating salmon fairly often. Given the generous bag limits in Cook Inlet and Copper River, a person with a PU permit in both areas and 3 additional family members could conceivably harvest 110 sockeye! Simple math says you would have to eat a little over 2 fish a week to use it all. Granted some would be shared with relatives and friends but is that the true intent of "Personal Use?" You have to be a real fish lover to consume 2 fish per week with a family of 4 and any of us who have frozen any amount of fish know that after 6 months the quality suffers. I think that one PU permit per area is still a generous gift to state residents but eligibility for both is an abuse of resources and privilege. Thanks for your time and commitment to this process and allowing users to comment.

Thanks, Ken Manning

Submitted by: Keith Mantey

Community of Residence: Cooper Landing

Comment:

Plan.

I also write in support of proposal 14 and recommend regulatory amendments that allow for Alaska Department of Fish and Game staff to manage the PWS pollock trawl fishery for conservation of bycatch species and important habitat under this proposal.

RE: PROPOSAL 15: 5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

If the PWS trawl fishery is not closed under proposals 14 and 16, the bycatch limits should be set to preserve the species that are bycaught and not be decided on the amount of pollock that is harvested.

RE: PROPOSAL 17: 5 AAC 28.263 Prince William Sound Walleye Pollock Pelagic Trawl Fishery Management Plan

If the PWS trawl fishery is not closed under proposals 14 and 16, the fishery should have third-party onboard observers and onboard electronic monitoring to accurately verify all bycatch amounts. Currently, ADFG relies on skipper and processor data to report bycatch limits this is not an effective way to monitor.

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811
marit.carlson-vandort@alaska.gov

November 26, 2024

Re: Prince William Sound Finfish Meeting Proposals

Dear Chair Carlson-Van Dort and Members of the Board of Fisheries,

I am an Area E commercial fishermen. I am a 4th generation area E salmon fisherman from Cordova. I have been gillnetting and seining for 19 years. I have been a boat owner for 9 years. I have fished nearly every fishery in Alaska and the west coast of the United States.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Sam Marchant

A solid black rectangular box used to redact the signature of Sam Marchant.

Cordova

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 1, 25, and 26 - OPPOSE

-Establish pot gear as legal gear for sablefish in PWS subsistence, sport, and personal use fisheries.

-Establish a personal use sablefish fishery in Prince William Sound.

-Establish a Prince William Sound groundfish personal use fishery.

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

SUPPORT this proposal with CDFU

Proposal 2 - SUPPORT

Reopen waters closed to the harvest of groundfish in Prince William Sound

Existing closure areas were created in the 1990's to protect crab stocks, but the areas defined that prohibit groundfish harvests force groundfish fishermen to use hooks instead of pots. This results in a greater harvest of rockfish and other non-targeted species. Passing this proposal will further incentivize the use of slinky pots that reduce potential crab bycatch because species are returned to the water unharmed, unlike rockfish bycatch by hooks.

SUPPORT this proposal with CDFU

Proposal 3 - SUPPORT

Modify Prince William Sound groundfish pot specifications

We are in favor of increased opportunity for IFQ fishermen to harvest their quota with reduced rockfish bycatch. Reducing halibut fishing with hooks will also decrease whale predation.

OPPOSE this proposal with CDFU**Proposal 5 - OPPOSE**

Adopt a provision to close waters to specific groundfish gear types for rockfish conservation.

Commercial rockfish harvest is not consistently exceeding its GHL. In fact, looking at the average harvest for the last ten years, commercial harvests are below the GHL. Being that rockfish are long-lived species and that on average the GHL is not exceeded, one individual year of exceeding the GHL does not necessitate BOF action. Harvest by commercial has not been growing, but sport harvest has more than doubled since the early 90's. Sport harvest in PWS now exceeds an estimated 340,000 lbs, which is more than double the commercial GHL. Furthermore, the commercial GHL was based on mean annual harvest and the state of Alaska has had no consistent rockfish survey in PWS.

ADFG is not enforcing the regulations of the current PWS rockfish management plan that are designed to limit rockfish harvest specifically: "a) A vessel may not land or have on board more than a combined total of 3,000 pounds (round weight) of all rockfish species within five consecutive days." Enforcing this regulation would be sure to limit trawl bycatch.

The Commissioner already has the ability to close any state fishery to conserve rockfish. This proposal is a means to regulate the federal halibut fishery, over which it does not have management authority. We have concerns that granting the state this power will, if it is used to close state waters to federal halibut fishing, put the state in conflict with federal law and open yet another legal dispute.

SUPPORT this proposal with CDFU**Proposal 6 - SUPPORT**

Allow for release of rockfish in mechanical jig and hand troll fisheries.

Sport fishermen regularly use deep water releases to return unwanted rockfish unharmed. We would like to see this proposal expanded to allow longline and pot fishermen to also be allowed to use deepwater releases to return rockfish.

OPPOSE this proposal with CDFU**Proposal 7 - OPPOSE**

Establish gear specifications for directed lingcod fisheries in Prince William Sound.

This proposal is an attempt to reallocate the lingcod resource away from traditional user groups. Longline fishermen in PWS rarely, if ever, target lingcod as claimed by proposer. Instead, the quota is caught as bycatch in the halibut longline fishery. The

lingcod fishery in PWS is quite small, with annual harvests of 20,000-30,000 lbs - the majority of which is harvested outside state waters.

The bycatch of rockfish in this fishery is only a small percentage, and is not enough to necessitate an expensive gear change. The GHL for lingcod is not being fully harvested, and longline fisheries are staying within the determined rockfish bycatch limits. Closing the lingcod fishery to longline gear would do little to reduce harvest of lingcod by the halibut longline fleet. They simply would be forced to surrender the proceeds of their lingcod bycatch to the state.

SUPPORT this proposal with CDFU

Proposal 8 - SUPPORT

Modify the Prince William Sound pacific cod fishery guideline harvest level.

The PWS Pacific cod fishery is not fully developed. Pacific Cod are plentiful, quota is being easily harvested in a small portion of the area, and much area is unfished.

Allowing for growth in the fishery with a percentage increase in quota on years when the quota is harvested will provide PWS fishermen with a much needed winter fishery. An incremental percentage increase is consistent with the initial structure of other state-waters Pacific cod fisheries. This is how quota was initially set to 25% in 2011.

SUPPORT this proposal with CDFU

Proposal 9 - SUPPORT

Combine the Pacific cod longline and pot gear allocations and close the longline fishery for Pacific cod when the commercial halibut fishery is closed.

The development and use of longlined collapsable slinky pots in the Pacific cod fishery allows much smaller vessels to fish pots than previously could. Multiple proposals have asked for the quota allocation of pots to be increased. Simply combining the longline and pot quota will allow fishermen to harvest the resource whichever way they prefer, while still leaving some quota set aside for small boat jig fishermen. Bycatch of rockfish is much lower when using pots than hooks. Closing the P-cod fishery to longline hooks for January and February will further incentivise fishermen to switch to fishing pots which will further reduce bycatch of rockfish.

SUPPORT this proposal with CDFU

Proposal 10 - SUPPORT

Modify pot limit in the Prince William Sound Pacific cod fishery.

The 60 pot limit was created when the pot fishery was being prosecuted with conventional hard pots weighing 500+ lbs and 6' tall or bigger. With the adoption of smaller lightweight slinky pots, a larger pot limit is prudent.

Lightweight, collapsible slinky pots used by the small boats participating in the cod fishery are much smaller than conventional hard pots. They have a volume of about 15 cubic ft per pot. A conventional hard pot has a volume of 120 cubic ft. Passing this regulation would allow small boats to fish 120 lightweight pots, which would further encourage the switch to pot gear from longlining hooks.

There is no definition of a slinky pot in regulation. Since it is a new, evolving technology, we would not suggest creating any regulation that might prohibit refinement of the design. Instead we suggest simply defining them as a “pot weighing less than 30 lbs”.

SUPPORT this proposal with CDFU

Proposal 13 - SUPPORT

Increase bycatch limits for skates in the Prince William Sound Pacific cod fishery.

There is an unharvested surplus of skates, and therefore fishermen should have the ability to harvest them. This could be either through a directed fishery or liberalized bycatch limits.

SUPPORT this proposal with CDFU

Proposal 19 - SUPPORT

Modify the commercial fishing season for sablefish in Prince William Sound.

The sablefish GHL has not been harvested since the implementation of the shared quota fishery in 2003. Managing through individual quotas has failed to allow full harvest of the resource. It is costing permit holders thousands of dollars in lost opportunity. Permit holders should have the opportunity to harvest fish that are being left in the water every year due to the cumbersome quota share system.

Some proposals request the season be extended into October. If the BOF chooses to pass one of those proposals, we would like to see proposal 19 modified so the “B season” begins two weeks after whatever new closure date is adopted.

SUPPORT this proposal with CDFU

Proposal 20 - SUPPORT

Modify the commercial fishing season for sablefish in Prince William Sound.

We know of no biological reason for the current season dates. Two other proposals request extending season length. Fishermen often start fishing halibut in PWS before the April 15th opener for sablefish, and are forced to throw all their sablefish back overboard.

SUPPORT this proposal with CDFU

Proposal 22- SUPPORT

Allow the concurrent use of longline gear and sablefish pot gear in Prince William Sound.

Fishing with pots should be encouraged. They have a lower bycatch rate of rockfish versus hooks. This proposal would align regulations with the federal fishery, where fishing with both pots and hooks is allowed.

Often groundfish fishermen deliver in a port other than their home port. If a Cordova-based fisherman goes halibut fishing, delivers in Seward, and then wants to pot fish black cod, he first has to run all the way back to Cordova to drop off his hooks. Halibut fishermen fishing in federal waters commonly have both pots and hooks aboard but often transit state waters, making for an enforcement nightmare.

SUPPORT this proposal with CDFU

Proposal 23 - SUPPORT

Prohibit the retention of sablefish from state waters.

Southeast Alaska also has a state water sablefish fishery, but does not have regulation this broad. Southeast's regulation: "5 AAC 28.170 (b) The operator of a fishing vessel may not take sablefish in the Northern or Southern inside Subdistricts with sablefish taken in another area on board."

This is a PWS sablefish management plan, and therefore regulations within should pertain to the PWS sablefish fishery. This regulation as written prohibits federal sablefish fishermen from operating gear for any species in state waters. These fishermen often don't even participate in the PWS sablefish fishery, and therefore have no reason to look for this regulation in the book. If the BOF wishes to keep this regulation as is, it will need to be moved to a more appropriate place as a general PWS groundfish regulation.

SUPPORT this proposal with CDFU

Proposal 27 - SUPPORT

Modify rockfish bag and possession limits.

The sport fleet is targeting rockfish on the same pinnacles day after day, catching and releasing hundreds of fish. Deep water releases have a decent survival rate when used once on a fish. But the same rockeye are being caught over and over again. We support the BOF creating a hard cap on rockfish harvest by the sport fleet to prevent their harvest level from continuing to grow.

OPPOSE this proposal with CDFU

Proposal 28 - OPPOSE

Modify the rockfish area, bag and possession limit.

There is no separate management for rockfish for inside and outside waters of PWS. As more and more participants move to outside waters, sport rockfish limits should be lowered, not raised.

SUPPORT this proposal with CDFU

Proposal 29 - SUPPORT

Create additional provisions for yelloweye rockfish management.

Any regulations should be placed on the user group whose harvest is growing unchecked. Sport rockfish harvest has been growing for 20 years. Commercial harvest has remained steady.

This proposal does not go far enough. The BOF should consider placing a harvest cap on sport rockfish to prevent continued expansion of this fishery. It should also expand to best manage all rockfish, not just yelloweye.

SUPPORT this proposal with CDFU

Proposal 31 - SUPPORT

Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

SUPPORT this proposal with CDFU

Proposal 32 - SUPPORT

Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING

SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

OPPOSE this proposal with CDFU

Proposal 33 - OPPOSE

Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

SUPPORT this proposal with CDFU

Proposal 34 - SUPPORT

Repeal the Registration Area E Tanner crab harvest strategy.

The current Area E Tanner crab harvest strategy is unworkable, as it relies too heavily on trawl surveys and does not allow for a fishery in the majority of the PWS area. At the 2021 meeting the Area E Tanner crab harvest strategy was passed as a placeholder that allowed for a small fishery in 2022. ADFG assured fishermen that a more holistic Tanner crab harvest strategy was forthcoming, and would be presented for the 2024 meeting.

CDFU encouraged fishermen to participate in the Tanner crab test fisheries over 4 years because the ADFG stated that they needed this data to create a harvest strategy for PWS. Instead, ADFG gave us a harvest strategy which did not use any test fishery data. This created no possibility of opening some of the best fishing grounds found in the test fisheries.

SUPPORT this proposal with CDFU

Proposal 35 - SUPPORT

Modify the harvest strategy for Prince William Sound Tanner crab.

At the 2021 BOF meeting, ADFG and fishermen worked together at the last minute to create a flawed PWS Tanner crab management plan. The BOF, ADFG and CDFU expressed interest in working together to create a more workable plan before the 2024 BOF meeting.

CDFU reached out to ADFG multiple times in the last year to collaborate on proposals related to PWS Tanner crab but received extremely limited input. Proposal 35 is our best attempt to create a workable harvest strategy for PWS Tanner crab that will result in a sustainable fishery.

SUPPORT this proposal with CDFU

Proposal 36 - SUPPORT

Increase the pot limit in the Prince William Sound Tanner crab fishery.

At the 2017 BOF meeting the pot limit was reduced from 75 pots to 30 pots. This was part of a large proposal by the ADFG to establish a new harvest strategy for PWS Tanner crab. No justification for the reduction was given by ADFG in their proposal or in ADFG staff comments. There was not public support for the reduction.

Pot limits should be set with input from the fleet. The pot limit reduction passed as part of a total rewrite of the Tanner crab management strategy. That harvest strategy was flawed in many ways, and working through that distracted from input on the pot reduction section.

Higher pot limits reduce handling of immature and female crabs because it increases soak times. This allows time for small crab to leave the pot via the escape rings. As we have in many different areas and other fisheries, Fishermen will ask the BOF to lower the pot limit if fishery participation increases and crowding becomes an issue from too many pots.

The small pot limit makes prospecting PWS exceptionally time consuming and expensive. Since the fishery reopened, there is a large portion of PWS, especially the outside waters, that have not been explored. Tanner crabs move in schools. They are easily missed when too few pots are spread over too large an area. This pot limit is damaging to the resource because it increases the handling of undersized crab. It also is economically damaging to fishery participants because it increases the bait, fuel, and time required to execute the fishery.

SUPPORT this proposal with CDFU

Proposal 37 - SUPPORT

Establish a pot limit of 30 pots per vessel in the Prince William Sound Tanner crab fishery.

ADFG does not need the ability to adjust pot limits to manage the fishery. For instance, the length of salmon seines isn't adjusted from season to season based on run size. The daily reporting requirement in regulation allows ADFG to closely monitor the pace of the fishery and close it when there is a danger of exceeding the GHL. There is no regulation allowing adjustment to pot limits by ADFG for Southeast or Kodiak, instead static pot limits are set by the BOF. In 2022 ADFG utilized this regulation to lower the pot limit to 25. This was a significant reason the fleet was unable to harvest the GHL that season.

SUPPORT this proposal with CDFU

Proposal 38 - SUPPORT

Allow vessels participating in the Prince William Sound Tanner crab fishery to also tender Tanner crab.

Modern communications and reporting requirements eliminate the concerns that have restricted tenders in the past. Allowing tendering by participants in this fishery will allow fishermen to reduce fuel usage by combining their catch on one boat to run to deliver. In the current economic environment, the BOF should be considering all options to reduce fuel consumption and increase profitability of small scale fisheries.

SUPPORT this proposal with CDFU

Proposal 39 - SUPPORT

Establish season dates for a commercial Golden King crab fishery.

Southeast Alaska has a booming Golden King crab fishery without a fishery independent assessment.

“The Alaska Department of Fish and Game (department) evaluates stock status and establishes guideline harvest levels (GHLs) for each management area using fishery dependent data including: catch per unit of effort (CPUE), harvest and biological information (carapace length, weight, and maturity) from dockside sampling landings. No population abundance estimates are obtained for GKC stocks.” -from the Regional Information Report No. 1J21-10 2020 Golden King Crab Stock Status and Management Plan for the 2020/21 Season

Our fishermen have seen ample evidence of Golden King crab abundance. ADFG has no assessment for Golden King crab in PWS and to date has stated no intention of developing the harvest strategy current regulation stipulates. It seems that this fishery will stay closed forever without action by the BOF.

SUPPORT this proposal with CDFU

Proposal 40 - SUPPORT

Adopt a harvest strategy for golden king crab in Prince William Sound.

Golden King crab fisheries must depend on CPUE in the commercial fishery to set its GHL, because there is no good way to survey. This proposed harvest strategy is similar to the one being used with success in Southeast.

As the fishery develops and distinct populations of Golden King crab are discovered, it will be prudent to break the area into districts. In the meantime, the statistical areas that are already in regulation allow for a reasonable starting point until the next BOF meeting cycle.

Local PWS economies are struggling following years of depressed fish prices, increased overhead costs for operations, and increased efforts of time for static harvests. It is imperative that the BOF direct ADFG to open these small scale fisheries, because they are simply not being proactively opened without BOF direction.

OPPOSE this proposal with CDFU

Proposal 42 - OPPOSE

Open a sport king crab fishery and liberalize the personal use king and Tanner crab fisheries in Prince William Sound.

Crab fisheries close during the summer months because this is when crab are molting and most susceptible to mortality from handling.

We oppose the opening of a sport fishery for King or Tanner crab without also opening a commercial fishery.

SUPPORT this proposal with CDFU

Proposal 43 - SUPPORT

Establish a directed octopus fishery in Prince William Sound.

In recent years the GHL for PWS octopus has not been harvested but fishermen are interested in an octopus fishery.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.

-Require in season reporting in subsistence and personal use fisheries.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

OPPOSE this proposal with CDFU

Proposal 48 - OPPOSE

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

SUPPORT this proposal with CDFU

Proposal 49 - SUPPORT

Prohibit transport services in the Glennallen Subdistrict.

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 51, 52, 53 - OPPOSE

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count

reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU

Proposal 55 - SUPPORT

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

OPPOSE this proposal with CDFU

Proposal 58 - OPPOSE

Amend the Copper River King Salmon Management Plan.

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

OPPOSE this proposal with CDFU

Proposal 59 - OPPOSE

Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 60, 61 - SUPPORT

-Modify the annual limit for the Chitina Subdistrict.

-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.

If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

SUPPORT this proposal with CDFU

Proposal 62 - SUPPORT

Allow inseason adjustment of the Copper River personal use maximum harvest level.

We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

OPPOSE this proposal with CDFU

Proposal 63 - OPPOSE

Amend the opening date of the Chitina Subdistrict personal use fishery.

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU

Proposal 64 - SUPPORT

Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

SUPPORT this proposal with CDFU

Proposal 65 - SUPPORT

Require a weekly permit and inseason reporting in the Chitina Subdistrict.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

SUPPORT this proposal with CDFU

Proposal 66 - SUPPORT

Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

SUPPORT this proposal with CDFU

Proposal 67 - SUPPORT

Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 68, 69 - SUPPORT

-Prohibit dipnetting from a boat in the Chitina Subdistrict.

-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

OPPOSE this proposal with CDFU

Proposal 70 - OPPOSE

Extend the lower boundary of the Chitina Subdistrict.

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase

effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

SUPPORT this proposal with CDFU

Proposal 71 - SUPPORT

Prohibit guiding in the Chitina Subdistrict.

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

SUPPORT this proposal with CDFU

Proposal 72 - SUPPORT

Close sport fishing for salmon based on water temperature in the Gulkana River.

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

OPPOSE this proposal with CDFU

Proposal 78 - OPPOSE

Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

SUPPORT this proposal with CDFU

Proposal 79 - SUPPORT

Close Main Bay to all fishing during hatchery cost recovery operations.

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

SUPPORT this proposal with CDFU

Proposal 80 - SUPPORT

-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.

Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

SUPPORT this proposal with CDFU

Proposal 81 - SUPPORT

Modify the area open to sport fishing near the Main Bay Hatchery.

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

OPPOSE this proposal with CDFU

Proposal 83 - OPPOSE

Allow a resident sport angler to use two rods when fishing for salmon.

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the

conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

Modify the sport fishing area and season dates in Ibeck Creek.

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

Modify the sport fishing area and season in a Copper River Delta system.

We firmly support protections for spawning coho salmon in the Copper River Delta.

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we

must all work together to reach escapement goals and ensure future healthy salmon runs.

SUPPORT this proposal with CDFU

Proposal 96 - SUPPORT

Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

SUPPORT this proposal with CDFU

Proposal 97 - SUPPORT

Reduce the minimum herring spawning biomass threshold.

Biomass thresholds are normally set based on a population's unfished size. There are now 30 years of population estimates where no fishery occurred. This data should be used to set fishery limits and exploitation rates.

The PWS and Gulf of Alaska ecosystems have changed drastically in the last 30-50 years, and will continue to change. There is no reason to keep the herring fishery closed until it achieves those historical population numbers. Environments are ever-changing and managers need to have an ability to adapt to outdated management strategies.

SUPPORT this proposal with CDFU

Proposal 98 - SUPPORT

Align Prince William Sound herring and salmon management area descriptions.

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

Proposal 99 - SUPPORT

Define commercial herring fishery districts in Prince William Sound.

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

SUPPORT this proposal with CDFU

Proposal 100 - SUPPORT

Adopt a Kayak Island District herring management plan.

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

Proposal 102 - SUPPORT

Allow commercial fishery permit holders to harvest herring for the own use as bait.

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Submitted by: Fred Marinkovich

Community of Residence: Gig Harbor, Wa

Comment:

I am writing in SUPPORT of proposals 56 and 57. Dual permits, also known as permit stacking. I am the author of proposal 57. I was involved with the adaption of this type of proposal in Bristol Bay. It has worked very well there since inception. It has also been a positive tool in the Cook Inlet drift fishery. I will be attending the BOF meetings in Cordova, and am looking forward to discussing the benefits my proposal with all of you. Thanks for your time, Fred Marinkovich F/V KERRY

Submitted by: Fred Marinkovich

Community of Residence: Gig Harbor, Wa

Comment:

BOF Board,

I would like to OPPOSE proposals #51, #52, #53, and #78. As an area E commercial drift fisherman with three children that are looking to eventually take over my fishing business, these four proposals would negatively effect the future of our fishery. Thank you for your time, I will be available for discussion at the BOF meeting. Fred Marinkovich F/V KERRY

Submitted by: Rosemarie Martell-Greenblatt

Community of Residence: Fairbanks

Comment:

Dipnetting for Salmon in the Copper River feeds my family and many friends who cannot fish for themselves.

Please do not allow commercial interests and greed to interfere with our right to feed ourselves. # 47 The fishing is so sporadic that it may take multiple fishing trips to obtain the harvest limit. Reporting should be done as it is now, when the fishing is completed. Resources for escapement numbers are solid, why would ADFG want to spend their time counting harvest numbers multiple times in a season ?

48 I need and depend on commercial services to take me up and down the river to fish from shore. Please do not interfere with this greatly needed and appreciated opportunity to subsist.

I OPPOSE the following Proposals

44,45,46,47,49,50,54,55,56,57,60,61,62,63,64,65,66, 67,68,69,71

I SUPPORT the following Proposals

48,51,52,53,58,59,70

Thank you for your attention to these important matters for ALL Alaskans.

November 26, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Members of the Board of Fisheries,

I have been a commercial salmon drift fisherman in Cook Inlet for 53 years. Also have also seined lower Cook Inlet and have crewed in PWS salmon seining.

Alaska commercial salmon fishermen decades ago voluntarily and financially took over hatcheries and hatchery operations from the State FRED division and more efficiently raised salmon for all user groups and helped stabilize the yearly economic viability, and activity of the commercial fishing industry and communities.

An egg take reduction of any amount is not warranted. There is no valid scientific data to justify any reduction. This proposal 78 for egg take reduction has been before the BOF before and was appropriately rejected. There is no new information and is once again proposed by anti-hatchery people, just using unproven theories, to create the slippery slope of making the hatchery associations unable to be financially sound. Hatcheries would close. Hatchery projects on improving and protecting habitat and invasive species irradiation and management would cease.

Less salmon for all users and many sports fisheries that were created by aquaculture associations enhancement projects, would also cease. The permitted egg take allotments per hatchery has been thoroughly and scientifically vetted and approved by ADF&G, their genetic department, RPT, the hatcheries Board of Directors and others. Most processors in Cook Inlet also process salmon from PWS to help them be profitable. Reducing salmon production in PWS especially on poor return years increases the likelihood of processors going out of business or leaving PWS and Cook Inlet which would be economically devastating to the commercial fishing industry and communities.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities.

Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska's broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska's hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska's economic and cultural fabric.

Sincerely,

David Martin

[REDACTED]

Clam Gulch, Alaska

Submitted by: Timothy Mason

Community of Residence: Valdez

Comment:

Limit early season commercial harvest of Copper river salmon to ensure the resource can sustain subsistence and personal use harvest.

Submitted by: Bill Mathis

Community of Residence: Anchorage

Comment:

I fully support the Alaska Outdoor Council's (AOC) Proposal #14 to close the PWS walleye pollock pelagic trawl fishery until the trawler fleet can guarantee they won't disturb the ocean floor bed. State protection of the seabed ecosystem in Alaska waters is a conservation concern to AOC and myself.

Dragging trawling gear along the seabed to gather fish is not sustainable nor in the best interest of the public's resource. Our fisheries' have been damaged enough already through commercial fishing. The crazy needs to stop if we are to expect our fisheries to survive.

Submitted by: Paul Matter

Community of Residence: North Pole, AK

Comment:

As an annual personal use fisher on the Copper and sometimes Kenai I do not want to see restrictions to my family's use of the sockeye and king resource. I am opposed to proposals 49,50,60,61,62,63,68 &71. I support proposal 58. I trust ADFG's biologists to manage our fisheries and am Leary of proposals submitted by commercial fishing interest. I have seen too many resource grabs and public restrictions from the commercial fishing industry to trust their motives in resource protection.

Submitted by: Kiril Matveev

Community of Residence: Area E Permit holder

Comment:

I'm writing and voting for the votes here on the behalf of the future of the fishing industry of area E. And how we are being suffocated by outside forces on our way of our lifestyle choices. We have never went out our way to attack other people's incomes. Always been on the defensive side. All we want is to be left alone and make a living how it always was for the past 30 yrs. Thank you

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 PWS and the Copper with my dad when I was 5 years old. I've been running my own bowpicker for 14 years, and bought into seining in 2022.

I respectfully ask you to consider my attached proposal positions for the Prince William Sound and Upper Copper/Upper Susitna Finfish and Shellfish (except shrimp) meeting.

Thank you for your time and consideration.

Sincerely,

Brandon Maxwell

A solid black rectangular box used to redact the signature of Brandon Maxwell.

Cordova

OPPOSE this proposal with CDFU**OPPOSE this proposal with CDFU****Proposals 25 and 26 - OPPOSE**

-Establish a personal use sablefish fishery in Prince William Sound.

-Establish a Prince William Sound groundfish personal use fishery.

The proposal 25 author states that the sablefish GHL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHL to a new personal use fishery. We do not support this, as we have authored proposals and support others that will remove some of the regulatory hurdles that prevent the commercial fleet from harvesting the full GHL.

Similar regulation exists in Southeast Alaska but Prince William Sound sablefish populations do not compare. The addition of a sport/personal use pot fishery in PWS will create a gear conflict with established longline gear. Participation in a sablefish pot fishery will require excessive gear and equipment expenses in order to safely haul pots, line and anchors to set in 2,000+ ft of water. This is burdensome for an average sport/personal use vessel, and very unlike setting shrimp pots in 300 ft of water. Associated difficulties will result in much lost gear. Today, sport fishermen are currently quite successful at targeting black cod with rod and reel. Electric reels are now affordable and commonplace.

SUPPORT this proposal with CDFU**Proposal 31 - SUPPORT**

Repeal closed waters for the Prince William Sound subsistence and commercial Tanner crab fisheries.

The PWS Tanner crab fishery is the only one in the state with closed waters. The closed waters are traditional Tanner crab grounds for both subsistence and the historic commercial fishery. Repealing the closed waters would increase access to the resource for subsistence users on the east side of PWS who are currently limited in protected area to crab.

Closed water regulations were passed in the 2017 and 2021 BOF meeting cycles, but not properly vetted. They were created to protect "Tanner crab nursery grounds" but this is flawed logic as the proposal points out. ADFG's own trawl survey does not show evidence of concentrations of juvenile crab in the closed waters of Fidalgo and Gravina. But it does show populations mixed with juveniles, females, and mature males throughout PWS.

SUPPORT this proposal with CDFU**Proposal 32 - SUPPORT**

Reopen the subsistence and commercial Dungeness crab fisheries in Prince William Sound.

This proposal's edits left it unclear what exact regulations we propose to be changed. We are asking for the commercial fishery to be opened by making the following changes to reflect traditional season dates in effect before the closure of the fishery: 5 AAC 32.210. Fishing seasons for Registration Area E [THERE IS NO OPEN FISHING SEASON FOR DUNGENESS CRAB IN THE PRINCE WILLIAM SOUND AREA.] In Registration Area E, male Dungeness Crab may be taken or possessed only from 12:00 noon March 20 through May 20 and from 12:00 noon August 25 through December 31. Pot limits and buoy marking requirements for the commercial fishery are already in regulation. We are asking for the subsistence fishery to be opened by making the following changes:

5 AAC 02.215. Subsistence Dungeness Crab fishery In the subsistence taking of Dungeness crab in the Prince William Sound Area: [IS CLOSED UNTIL THE DUNGENESS CRAB STOCKS RECOVER ENOUGH TO PROVIDE A HARVESTABLE SURPLUS AND REGULATIONS ARE ADOPTED BY THE BOARD OF FISHERIES THAT REOPEN THE FISHERY.]

Dungeness Crab may be taken from March 20 through May 20 and from August 25 through December 31

the daily bag and possession limit is 5 crab per person

only male Dungeness Crab six and one-half inches or greater in shoulder width may be taken or possessed; male Dungeness Crab less than the minimum legal size and female Dungeness Crab that have been taken must be immediately returned to the water unharmed; for the purposes of this paragraph, the shoulder width measurement of Dungeness Crab is the straight-line distance across the carapace immediately anterior to the tenth anterolateral spine, not including the spines;

a pot used to take Dungeness Crab under this section must have at least two escape rings that each are not less than four and three-eighths inches, inside diameter; the escape rings must be located on opposite sides of the pot and the upper half of the vertical pane of the pot

no more than 10 ring nets or pots per person, with a maximum of 20 ring nets or pots per vessel, may be used to take Dungeness Crab.

OPPOSE this proposal with CDFU

Proposal 33 - OPPOSE

Adopt community-based subsistence harvest permits and reporting requirements for shellfish in the Prince William Sound Area.

Community-based subsistence harvest permits are not granted for fish or shellfish.

The commercial fishery is an open access fishery. Opening a small-scale commercial fishery provides opportunity for all users.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 46, 47 - SUPPORT

-Require harvest reporting within seven days of harvest in the lower Copper River district subsistence salmon fishery.

-Require in season reporting in subsistence and personal use fisheries.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required real-time reporting for years, proving it is possible. We do not believe requiring weekly reporting on the lower Copper River will cause any burden to subsistence users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

OPPOSE this proposal with CDFU

Proposal 48 - OPPOSE

Repeal the prohibition of subsistence guide services in the Glennallen Subdistrict.

The commercialization of subsistence resources in Alaska goes against their intended use. No one should collect profits from a subsistence fishery. Additionally, competition by professional guides in a subsistence fishery increases the cost and difficulty for participants not using a guide service to be as productive.

Preventing the commercialization and guiding within the subsistence fishery is a precedent being set across Alaska. Prohibiting the commercialization of subsistence fisheries became statewide regulation in 2024; repealing this would need to be taken up at the statewide BOF meeting.

SUPPORT this proposal with CDFU

Proposal 49 - SUPPORT

Prohibit transport services in the Glennallen Subdistrict.

We support this proposal but with an edit that would add the restriction of “transporting” but also retain “directing” in the regulation. Removing “directing” may create ambiguity in the regulation.

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

OPPOSE this proposal with CDFU

Proposals 51, 52, 53 - OPPOSE

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Reduce commercial salmon fishing opportunity in the Copper River District.

-Allow the Copper River District commercial salmon fishery to open for the first two periods, then close until the Copper River cumulative salmon management objective is met.

These proposals restrict ADFG from managing the fishery to their best potential by taking management tools from local fish biologists/manager. Management has shown to already restrict early commercial effort. The objectives of these proposals will have severe economic impacts to the fleet and the region.

The 2012, 2013 and 2015 seasons saw huge escapement numbers that led to a negative spawner recruitment model for the returning years of 2017, 2018, and 2020. Without commercial harvest in the Copper River district, this could have led to an even more drastic over-escapement of the years that exacerbated a decline in spawner recruitment.

Additionally, the run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU**Proposal 55 - SUPPORT**

Restrict commercial guide services in the Upper Copper River District when the Copper River District commercial fishery is restricted.

We favor how this proposal addresses a shared burden of conservation. It is irresponsible and unsustainable to allow commercial guiding operations to efficiently harvest king salmon upriver while downriver commercial users are restricted in an effort to allow these same kings into the river. As the author stated, commercial users throughout this river system should share the responsibilities when necessary to ensure the conservation of this resource.

OPPOSE this proposal with CDFU**Proposal 58 - OPPOSE**

Amend the Copper River King Salmon Management Plan.

With statewide concerns for king salmon, this is not a time to consider raising limits.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of sockeye, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

OPPOSE this proposal with CDFU**Proposal 59 - OPPOSE**

Amend the Copper River Personal Use Dip Net Salmon Fishery Management Plan.

This proposal is a reallocation of a resource that is already at its allocation limit.

Personal use dip netting is not species-discriminative. Passing this proposal will mean more incidental harvest of king salmon, while the survival rates of salmon released from dip nets is not known. Releasing from a dip net on the Copper River often involves the fish being removed from the water and then dragged up a rocky cliff to be removed manually. Dip nets are made of gillnet web that tangle in a fish's gills and can cause further injury.

SUPPORT this proposal with CDFU**SUPPORT this proposal with CDFU****Proposal 60, 61 - SUPPORT**

-Modify the annual limit for the Chitina Subdistrict.

-Modify the annual limit and establish a supplemental permit for the Chitina Subdistrict.
 If the personal use fishery exceeds its allocation, there should be restrictions placed on this gear group to ensure conservation of the Copper River salmon population. With increased interest and growth in the personal use fishery, we must reduce the limits to allow all participants equal access, while also protecting this resource for future generations.

With no cap on personal use participants, the most direct way to protect the resource and remain within the allocation parameters is to reduce the annual bag limit.

SUPPORT this proposal with CDFU

Proposal 62 - SUPPORT

Allow inseason adjustment of the Copper River personal use maximum harvest level.
 We favor how this proposal addresses a shared burden of conservation. We are in support of adopting a triggered regulation for conservation purposes. During times of concern, all user groups should be managed accordingly to ensure the long-term viability of this resource.

In years of low abundance, the commercial fishery typically bears the burden of conservation and sees significant reductions, but other user groups do not.

CDFU submitted a similar triggered-regulation proposal to the 2021 BOF meeting, which suggested a new section for regulation 5 AAC 77.591: if the Copper River District commercial harvest is 50% below the 10 year average by June 1, the maximum harvest level in the Chitina subdistrict will be reduced to 50,000 sockeye.

OPPOSE this proposal with CDFU

Proposal 63 - OPPOSE

Amend the opening date of the Chitina Subdistrict personal use fishery.

We share concerns about dip net pressure on Copper River stocks, however we do not support restricting management based on projected run timing curve. The run timing curve or “cumulative management objective” is not accurate and was created decades ago.

Run timing can vary drastically from season to season. A good example of this is the 2013 season, when the run was extremely late in going up the river. Fish did not start passing the sonar in large numbers until May 30th, at which point only 8,206 fish had passed but the cumulative management objective was 157,321. By June 10th, the extremely condensed run was charging up the river with the daily escapement count reaching a record level of 113,977 fish versus the anticipated daily count of 12,115. The

final escapement count for the 2013 season was 1,267,060 versus the objective of 695,308. This drastic over-escapement event would have been much worse if the proposed regulation would have been in effect, as it would have prevented the harvest of an additional 320,337 sockeye.

SUPPORT this proposal with CDFU

Proposal 64 - SUPPORT

Prohibit a household from possessing permits for multiple personal use salmon fisheries in the same year.

Personal use limits were originally set based on what needs a participant may have for the year. Allowing a user to obtain their bag limits in multiple personal use fisheries is a loophole in state regulation that should be closed for conservation purposes.

Commercial salmon boats must choose what state regulation area they will fish. In other instances in regulation, there are aggregate harvest limits based on area: In Game regulation, deer cannot be harvested to a full limit in PWS, Kodiak, and Southeast in one year.

SUPPORT this proposal with CDFU

Proposal 65 - SUPPORT

Require a weekly permit and inseason reporting in the Chitina Subdistrict.

Timely and accurate reporting from all users along the Copper River is essential to understanding and managing the resource. Local area managers often take into account informal subsistence harvest reports to give indication of run strength when the commercial fishery is closed. Inseason reporting will increase the accuracy of harvest reports.

Existing regulations for reporting were written at a different time before fishermen had immediate access to cell phones and the internet. Commercial fisheries have required realtime reporting for years, proving it is possible. We do not believe requiring weekly reporting in the Chitina Subdistrict will cause any burden to its users. We cannot continue to wait until October 31st to understand the effects of any user group on the wild salmon populations.

Even if ADFG is not immediately ready to process this data, its collection will create the dataset for when they are ready to use better science in the future.

SUPPORT this proposal with CDFU

Proposal 66 - SUPPORT

Manage the Chitina Subdistrict personal use fishery to achieve the Gulkana Hatchery broodstock goal.

Despite evidence of a strong return, the egg take goal for Gulkana hatchery was not achieved in 2024. It is imperative for all user groups to be managed for salmon resource goals. A similar regulation is in place for every other hatchery in the area and this regulation alignment will close a loophole as well as ensure efficient hatchery operations.

SUPPORT this proposal with CDFU

Proposal 67 - SUPPORT

Prohibit removing king salmon from the water if it is to be released in the Chitina Subdistrict.

This proposal encompasses good science. King salmon that are released must be given an opportunity to survive and spawn.

SUPPORT this proposal with CDFU

SUPPORT this proposal with CDFU

Proposal 68, 69 - SUPPORT

-Prohibit dipnetting from a boat in the Chitina Subdistrict.

-Establish restrictions when dipnetting from a boat in the Chitina Subdistrict.

Regulation was written before the growing efficiency of this personal use fishery. We need to adapt regulation now to account for drastic changes in harvest and increased commercialization of the personal use fishery in recent years brought through guided express boat charters. Our Copper River king and sockeye resources simply cannot handle the impacts of an increased style of fishing prevalent in the Chitina subdistrict. The efficiency of the guided boat personal use dip net fishery has driven this gear group to be above their allocation.

OPPOSE this proposal with CDFU

Proposal 70 - OPPOSE

Extend the lower boundary of the Chitina Subdistrict.

The personal use dip net fishery has been exceeding its allocation in recent years. Instead of relieving pressure on the resource, this proposal to move a boundary would simply move pressure downriver: more area for the Chitina subdistrict will only increase effort by dipnetters and lead to more boats and pressure on the resource. There is a finite resource that is fully allocated, and we cannot continue to give more.

SUPPORT this proposal with CDFU

Proposal 71 - SUPPORT

Prohibit guiding in the Chitina Subdistrict.

We are in support of this proposal that addresses the increased commercialization of the personal use fishery. A commercial gillnet fishery for Copper River salmon already

exists: the Area E commercial gillnet fishery at the mouth of the Copper River. Anyone who would like to commercialize the harvest of fish can purchase an Area E gillnet permit.

Personal use only makes sense if Alaska residents are getting access to a resource for less than it would cost to purchase the resource. The commercialization of the personal use fishery through private guiding increases the cost to the average participant, as each fisherman is forced to either compete with skilled guides in powerful boats or pay upwards of \$400 dollars a day to ride along. When personal use fishermen invest in expensive guide services to harvest their fish, it easily equates to \$20 per fish or more. This is more than someone might pay purchasing fish at Costco! Obtaining fish by paying money in the personal use fishery more closely resembles sport, because it is a joke, one where commercial fishermen are a punchline.

Prohibiting guiding in the Chitina subdistrict is a straightforward and fair way to alleviate congestion and pressure on the resource.

SUPPORT this proposal with CDFU

Proposal 72 - SUPPORT

Close sport fishing for salmon based on water temperature in the Gulkana River.

Heat stress on salmon is well-studied. Similar practices are being put in place throughout the US.

OPPOSE this proposal with CDFU

Proposal 78 - OPPOSE

Reduce Prince William Sound hatchery permitted pink salmon egg take level by 25%.

There is no conclusive evidence to suggest this proposed decrease in pink and chum production. The BOF has repeatedly turned down similar anti-hatchery proposals for this very reason in the last twenty years. This proposal asks the BOF to modify regulation 5 AAC 24.370. However, this regulation does not address egg take level, nor does any regulation implemented by the BOF. For this reason, this proposal and any future proposals like it should be rejected.

Passing this proposal will result in serious economic harm to every salmon permit holder CDFU represents. The total economic impact of PWS hatcheries is significant, and reducing their production will mean immediate economic downturns on communities already beset with revenue losses due to depressed fish prices and fishery resource disasters. PWSAC activities alone are estimated to contribute approximately \$50 million in labor income and support roughly 2,400 jobs.

The goal of these hatcheries is not solely economic. They must achieve their corporate escapement goals to continue to operate and produce salmon for all user benefit. Their goal is to optimize Area E salmon production for the long-term wellbeing of all user groups, in addition to optimizing Alaska's wild salmon resources. We all should be reminded of the benefits that these hatcheries provide for all user groups, including commercial, sport, personal use, and subsistence.

SUPPORT this proposal with CDFU

Proposal 79 - SUPPORT

Close Main Bay to all fishing during hatchery cost recovery operations.

All common property users should cooperate to allow PWSAC to achieve its corporate escapement goals. We should all understand the importance of efficient cost recovery and brood take at the Main Bay Hatchery. All user groups depend on the accomplishment of these two goals for the future of this resource. It is counterproductive to have some user groups interfering with PWSAC's operations that are essential for the benefit of all. Eliminating conflict and maximizing efficiency during cost recovery and brood operations will only help all users. At times, there may only be a window of just a few days when optimal harvest by cost recovery can take place. If that is bogged down by subsistence or personal use fishing, opportunity is lost for all.

Passing this proposal still allows for sufficient access inside Main Bay to harvest sockeye salmon. There are many areas outside the AGZ in Main Bay where sockeye build up and allow for great harvest opportunities for sport and subsistence users. When PWSAC is actively working to collect brood and harvest cost recovery, the Main Bay Subdistrict is generally closed to commercial fishermen, and this allows exclusive access to sport and subsistence users. Until cost recovery efforts terminate, these user groups would still have sole access to this resource outside the THA within Main Bay.

SUPPORT this proposal with CDFU

Proposal 80 - SUPPORT

-Manage the Main Bay sport fishery based on the hatchery corporate escapement goal.

Increasing the sport fishing distance from the barrier seine is essential to eliminating the majority of the damage from boats and tackle to the hatchery barrier seine. If we do not increase this distance, the problem will not be solved. The current setback distance does not protect hatchery property or its staff, as fishermen still can easily reach the barrier seine with their snagging hooks. Moving this distance back to 250 feet should eliminate the negative impact on the hatchery, and anglers will still have sufficient opportunity to harvest sockeye in Main Bay.

By closing the area behind the barrier seine to all sport fishing, fish being staged for broodstock will no longer be harvested. Closing the area will also reduce the number of wounded fish that are compromised and must be culled from the brood stock.

We also want to ensure ADFG has the tools to work with hatchery staff to manage the sport fishery in Main Bay. A precedent for this exists at the Ship Creek Hatchery in Anchorage, where EO authority has been used to shut down the sport fishery to ensure the hatchery accomplished its brood goals.

The end goal is to collaboratively assist PWSAC in successfully achieving their corporate escapement goals each year, while reducing the damage to PWSAC property and the risk of injury to PWSAC staff.

SUPPORT this proposal with CDFU

Proposal 81 - SUPPORT

Modify the area open to sport fishing near the Main Bay Hatchery.

We support PWSAC's effort to resolve this issue in Main Bay through their Proposal 81, but suggest adopting Proposal 80 to ensure the problem at hand is solved.

OPPOSE this proposal with CDFU

Proposal 83 - OPPOSE

Allow a resident sport angler to use two rods when fishing for salmon.

There is already reasonable access in this fishery. The suggested regulation change could cause enforcement issues. How would enforcement know that only salmon are being retained while fishing with two rods?

SUPPORT this proposal with CDFU

Proposal 84 - SUPPORT

Prohibit charter operators and crew from retaining king salmon and rockfish while clients are on board the vessel.

Sport harvest of saltwater kings and rockfish has been significantly increasing over the last ten years. This is increasingly concerning for our region which is vested in the conservation of Chinook salmon and rockfish. With a growing sport fish charter industry, it is not sustainable to continue to allow charter captains and crew to retain their bag limit while clients are on board. ADFG is already moving in this direction in Proposal 29, and the precedent is already set in Kodiak, Southeast, and federally for halibut. This would bring PWS into alignment.

OPPOSE this proposal with CDFU

Proposal 85 - OPPOSE

Modify the bag and possession limit for coho salmon.

This proposal is an allocative grab by the author to take a larger portion of the resource for the benefit of their company and clients. This year, ADFG reduced the bag limit to one coho salmon. This is not the time to double the bag limit from three fish to six fish.

The author also suggests this regulation change to target hatchery-bound coho salmon. There is already an expanded coho take in Valdez Arm to target these hatchery fish. Increasing the bag limit across the region has the potential to negatively impact many small wild coho streams around PWS.

SUPPORT this proposal with CDFU

Proposal 86 - SUPPORT

Modify the sport fishing area and season dates in Ibeck Creek.

With increased effort later in the season on Ibeck Creek, we support this proposal to protect spawning coho salmon. It does not make sense to allow fishing in spawning beds. These fish have already been counted as escapement by ADFG aerial surveys, and should be left to spawn and ensure future runs.

SUPPORT this proposal with CDFU

Proposal 87 - SUPPORT

Modify the sport fishing area and season in a Copper River Delta system.

We firmly support protections for spawning coho salmon in the Copper River Delta.

SUPPORT this proposal with CDFU

Proposal 88 - SUPPORT

Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.

We support this proposal that addresses a shared burden of conservation to protect our salmon fisheries. If the commercial fleet is restricted to protect coho salmon during years of low run entry and low aerial survey counts, the sport fishery should be similarly restricted to protect coho in the Copper River Delta. During years of low returns, we must all work together to reach escapement goals and ensure future healthy salmon runs.

SUPPORT this proposal with CDFU

Proposal 96 - SUPPORT

Change herring management year dates for the Prince William Sound District and create a new food and bait fishery allocation.

The rebound of PWS herring populations needs action by the BOF to ensure the maximum value of the species. Changing the annual season dates to align more with

the calendar year and begin with the spring sac roe fishery will enable processors and fishermen to best plan for how to participate. Instituting the rollover of quota from the sac roe fishery to the food and bait fishery will solve dilemma that exists in other Alaska herring fisheries.

SUPPORT this proposal with CDFU

Proposal 97 - SUPPORT

Reduce the minimum herring spawning biomass threshold.

Biomass thresholds are normally set based on a population's unfished size. There are now 30 years of population estimates where no fishery occurred. This data should be used to set fishery limits and exploitation rates.

The PWS and Gulf of Alaska ecosystems have changed drastically in the last 30-50 years, and will continue to change. There is no reason to keep the herring fishery closed until it achieves those historical population numbers. Environments are ever-changing and managers need to have an ability to adapt to outdated management strategies.

SUPPORT this proposal with CDFU

Proposal 98 - SUPPORT

Align Prince William Sound herring and salmon management area descriptions.

Defining salmon and herring areas in alignment will simplify regulation and bring consistency for participants in both fisheries.

SUPPORT this proposal with CDFU

Proposal 99 - SUPPORT

Define commercial herring fishery districts in Prince William Sound.

The recent discovery of a large new herring population at Kayak Island needs defined waters to operate an exploratory herring fishery.

SUPPORT this proposal with CDFU

Proposal 100 - SUPPORT

Adopt a Kayak Island District herring management plan.

A Kayak Island herring population was never included in the historic fishery or PWS herring management plan. As the ecosystem and climate changes, the BOF and ADFG must act rapidly to allow for new fisheries to be conducted.

SUPPORT this proposal with CDFU

Proposal 102 - SUPPORT

Allow commercial fishery permit holders to harvest herring for the own use as bait.

A regulation like this exists in most other areas in Alaska. Here are examples:

Southeast: 5 AAC 27.170. Harvest of bait by commercial permit holders in Southeastern Alaska Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held

Yakutat: 5 AAC 27.270. Harvest of bait by commercial permit holders in Yakutat Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Kodiak: 5 AAC 27.545. Harvest of bait by commercial permit holders in Kodiak Area. The holder of a valid CFEC interim use or limited entry permit may take but may not sell herring for use as bait in the commercial fishery for which the permit is held as follows:

Submitted by: Brandon Maxwell

Community of Residence: Soldotna

Comment:

I strongly oppose gear stacking

Submitted by: James Mayor

Community of Residence: Ester

Comment:

Oppose: 44, 45, 46, 47, 49, 50, 54, 55, 56, 57, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 71, 72

Support: 48, 58, 59, 70

I generally oppose any proposal that limits personal use and gives more to commercial fishing fleets.

Submitted by: David Mays

Community of Residence: Palmer

Comment:

In general, I oppose any new restrictions or reductions made to the PU fishery. I and my family do depend on this as a food source here. With the high inflation we have seen, food security is becoming a real issue here in Alaska. There are far too many families like mine that depend on this resource, and it is wrong to take it away.

Submitted by: Peter Mazeika

Community of Residence: Pleasant Grove, Utah

Comment:

I am very concerned about props 86,87 & 88. My wife and I and children and grandchildren and friends (14 to 16 people) and I have been coming to Cordova and sport fishing for salmon for the past 22 years. We come out in September every year on the third full week that starts on a Sunday. Next year we will arrive on 9/21/25 for a full week of fishing. We prefer to fish the Eyak, but also fish the Ibek, the culverts, and the Alaganik especially when the Eyak is running high and difficult to fish which is common. We both fly fish and spin cast depending upon the conditions. These proposed changes would dramatically impact our sport fishing experience and if implemented would cause us to stop our trips to Cordova. It is important to understand that sport fishing continues until at least the end of September. The 24-36 hr. commercial openers in recent years are also very negatively impacting our experience on the Eyak. In 2024 there were very few fish after the opener. Thank you.

Submitted by: Paul McCabe

Community of Residence: Kodiak ak

Comment:

Hi, my name is Paul McCabe, I am the captain of the fishing vessel Nichole out of Kodiak Alaska. I've been fishing out of Kodiak for 15 years, where my wife, children and I are residents. We fish out of Kodiak nine months a year and tender salmon in PWS for 60 days in the summer. My 2 oldest sons have been tendering on my boat since they were only 4 years old. They also go out on fishing trips with me from time to time as this is their future legacy. I have been fishing the Nichole for 5 years in the sound along with our other boats the Chellissa, the Dawn and Mardel Norte. It is very important income at the beginning of the year for all of our families and all of our crew. We have installed electric monitoring on our boats.pws is our only option that time of the year and we all rely on that income from PWS. I oppose Proposals 14, 15, 16, and 17. Thanks for taking the time to read this.

Submitted by: Thomas McCall

Community of Residence: Fairbanks

Comment:

I participate in the charter dipnet fishery on the Copper River. This is a wonderful opportunity that I would like to see continue. We Alaskan's are extremely fortunate to have these resources. Commercial fisheries are notorious for overfishing and depleting fish populations, including the Atlantic herring and salmon. I support proposals 58,59, and 70. I oppose 61,62,63,64,65,66,67,68,69.

November 24, 2024

Alaska Board of Fisheries
P.O. Box 115526
Juneau, AK 99811-5526

Dear Board of Fisheries,

I am from Homer, Alaska, and I participate in the Prince William Sound seine fishery. Alaska salmon hatcheries have allowed me to make a living and provide for my family, both financially and as a food source. A 25% decrease in revenue would put me in a difficult position to keep my business afloat, and with the rising cost of maintenance, I would be concerned that I wouldn't be able to keep my vessel in safe working order.

I am writing to express my opposition to Proposal 78, which seeks to reduce hatchery-permitted pink and chum salmon egg take levels by 25% in Prince William Sound. This proposal would severely undermine the economic stability and sustainability that hatcheries provide to Alaskan coastal communities. Please review the following reasons why the Board should oppose and reject Proposal 78:

Economic Significance of Hatcheries: Hatchery programs are a cornerstone of Alaska's economy, generating \$576 million in annual economic output and providing the equivalent of 4,200 jobs statewide. In Prince William Sound alone, hatcheries contribute to over 2,200 jobs, \$100 million in labor income, and \$315 million in total economic output. Reducing hatchery production by 25% would have disastrous economic consequences for communities such as Valdez, Seward and Cordova, which rely heavily on the steady stream of hatchery-produced salmon to support their economies. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact Whittier, Chenega, Tatitlek, and various lodges in the region.

Preserving Access for All User Groups: Hatcheries are critical to ensuring that salmon remain available to all user groups, including commercial, sport, personal use, and subsistence fishermen. These programs ensure that Alaskans, regardless of their fishing style, have access to sustainable salmon harvests. Without hatchery supplementation, wild salmon stocks would be under increased pressure, particularly in years of lower abundance. Hatcheries play a crucial role in mitigating this pressure, safeguarding wild stocks, and providing economic stability for all user groups.

Sustainability and Responsible Management: Hatchery programs in Alaska are built on a strong foundation of sustainability and are subject to rigorous oversight from the Alaska Department of Fish and Game. Hatchery-produced salmon are managed through sound scientific practices, ensuring that they complement, rather than harm, wild salmon stocks. Moreover, Alaska's salmon fisheries, including hatchery-origin fish, are consistently certified as sustainable by both

major certification bodies – the Marine Stewardship Council and Responsible Fisheries Management (RFM). This demonstrates that hatchery production aligns with Alaska’s broader goals of responsible resource management.

Impacts of Proposal 78: Proposal 78 would reduce hatchery production at a time when salmon-dependent communities need it most. Reducing pink and chum salmon production by 25% would cause significant harm to fisheries tax revenues, disrupt the economic flow that hatchery salmon provide, and weaken the support hatcheries provide to wild stocks by decreasing the harvest pressure from user groups. This proposal would be highly disruptive to the sustainability of Alaska's hatchery programs, setting in motion an alternative oversight process in conflict with existing hatchery regulation. This process will introduce uncertainty in the production of Alaska hatchery salmon, impacting a hatchery association to plan production and its ability to service loan obligations. This proposal does not account for the well-documented role hatcheries play in supplementing wild returns, stabilizing economies, and ensuring long-term sustainability for coastal communities. Additionally, the data regarding hatchery impact on wild salmon populations needs to be more conclusive and support the drastic reductions proposed in this measure.

For 50 years, Alaska’s hatcheries have been a critical component of sustainable fisheries management. They provide for the livelihoods of thousands of Alaskans and create a stable and reliable source of salmon for all user groups. I urge the Board of Fisheries to reject Proposal 78 and instead continue supporting hatcheries as a vital part of Alaska’s economic and cultural fabric.

Sincerely,
Connor McCarthy

[REDACTED]

Homer, Alaska

Submitted by: Lisa McConarty

Community of Residence: Wasilla

Comment:

60 oppose- do not take half of our food

61oppose- do not reduce our food

62 oppose

63oppose- do not give commercial fishers a 6 week opportunity to wipe out our food supply

64oppose- 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

45oppose- commercial fishers are taking enough of our kings, they shouldn't get more

46oppose- 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. Ahntna 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 “dipnet” (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 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:

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,
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 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: 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

Proposal 88 - Modify coho salmon fishery bag limits and methods and means if the commercial fishery is closed.: SUPPORT this proposal with CDFU

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 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

A solid black rectangular box used to redact the signature of 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.

Native Village of Eyak
 110 Nicholoff Way
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 www.eyak-nsn.gov



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

A solid black rectangular box used to redact the signature of Luke Nelson.

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 black rectangular redaction box covering 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

A solid black rectangular box used to redact the signature of 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.
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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)

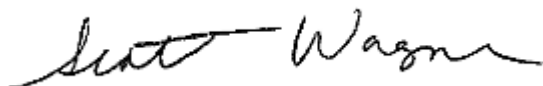
DEPARTMENT COMMENTS: The department **OPPOSES** this proposal. Hatchery egg-take levels are established through an iterative process involving department staff and stakeholders. Hatchery operations are permitted with consideration of minimizing impact on wild salmon stocks. The commissioner can amend 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



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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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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". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

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.

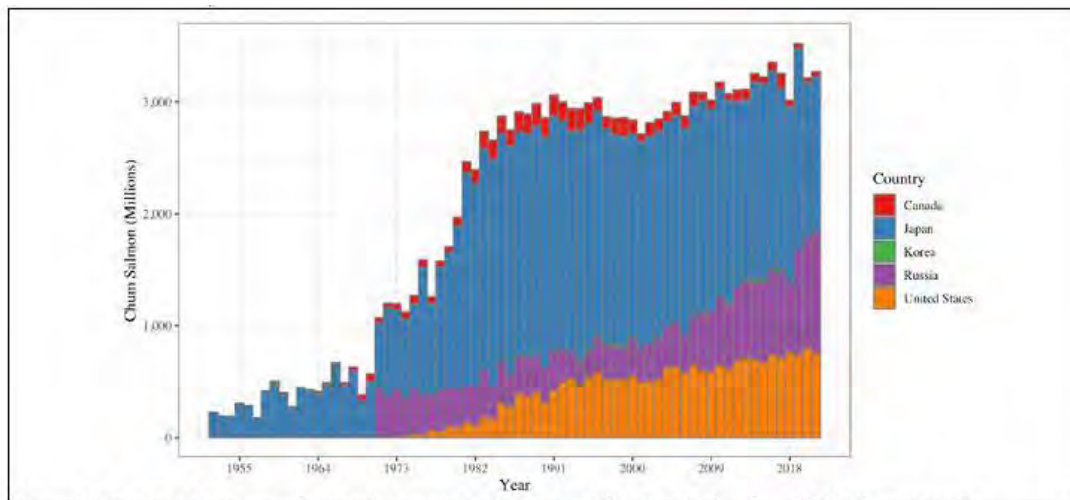


Figure 6-4 Total hatchery chum salmon production around the Pacific rim from 1952 through 2021

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

[REDACTED]

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:

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,

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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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 flourish at the end.

Geoff Clark
General Manager/CEO

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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 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,



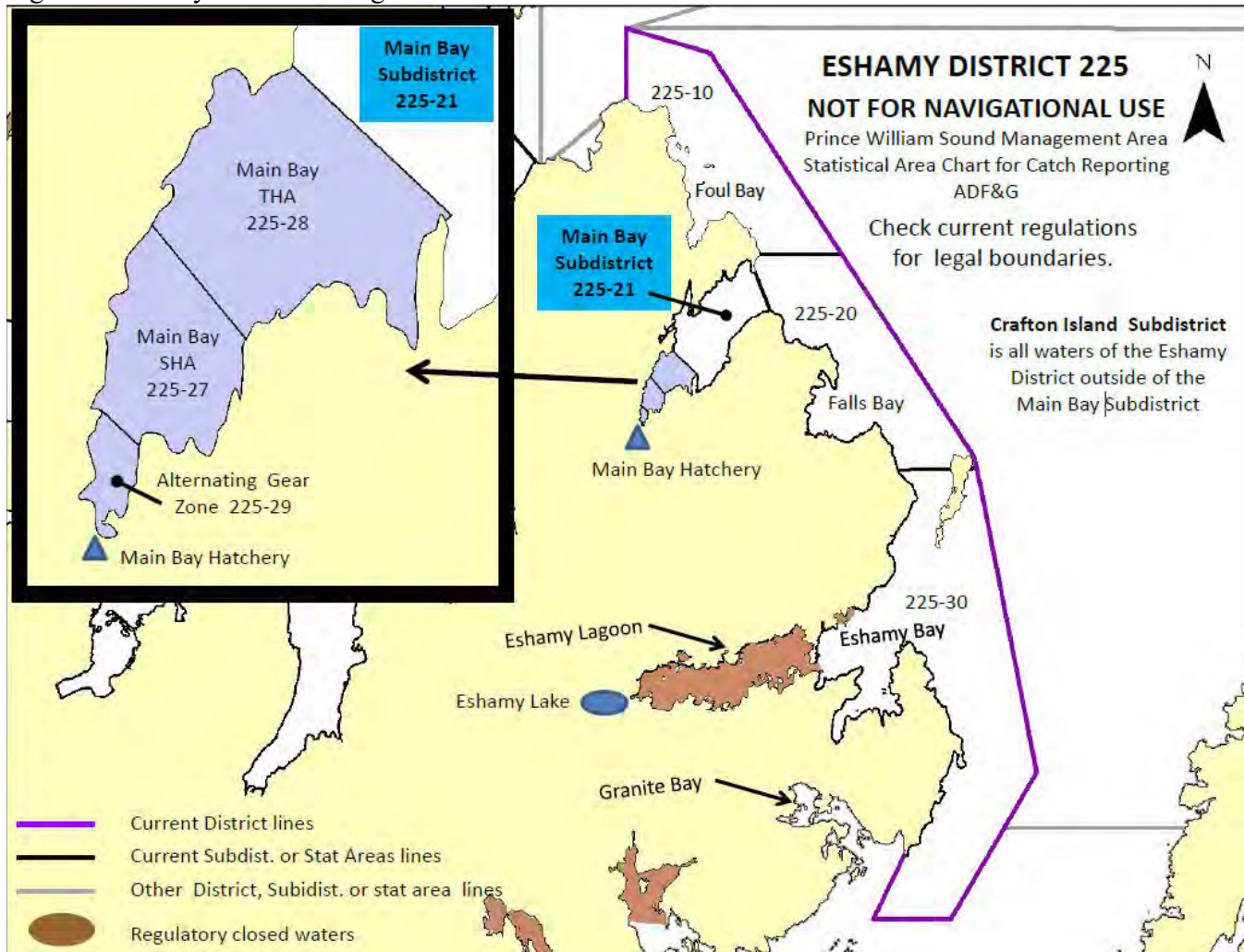
Geoff Clark
General Manager/CEO

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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.

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,



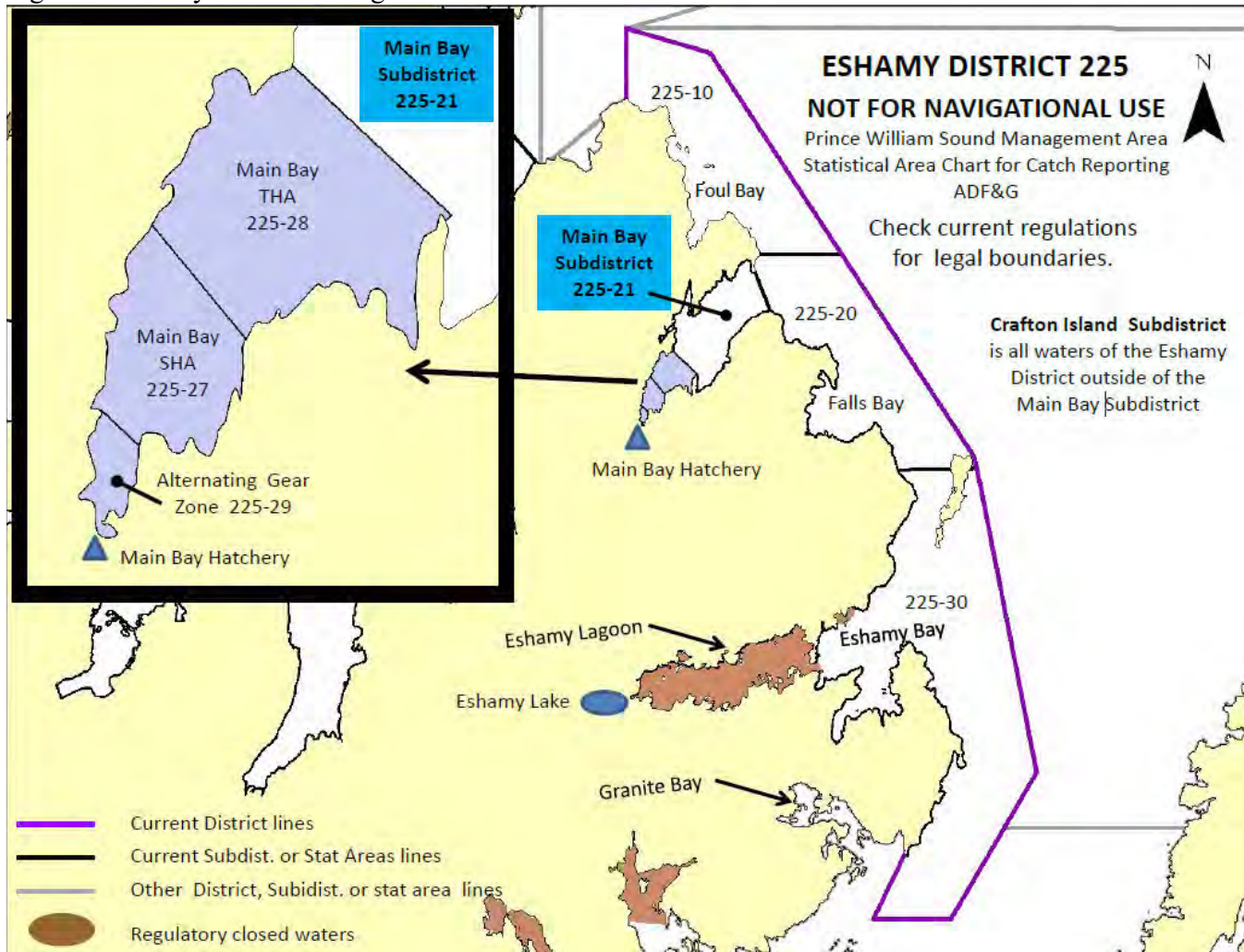
Geoff Clark
General Manager/CEO

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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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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 supports Proposal 81

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.

Within the Main Bay Hatchery (MBH) Special Harvest Area (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 ensure orderly fishing outside the barrier seine by all user groups during brood collection. The current regulation is not supporting that goal with a resultant loss or surplus fish to cost recovery and/or common property fisheries with an 11-year average exceeding 16,000 sockeye salmon (Table 1).

Snagging hooks are the primary reason for losing barrier seine integrity as they consistently become entangled in the barrier seine. Over multiple tides, additional mesh becomes entangled with a snagging hook, resulting in lifting leadlines or sinking corklines and allowing unwanted fish passage behind the barrier seine.

Barrier seine integrity can also be lost when propellers cut holes as boats drive over the top of the barrier seine. Not all boats may even know this has occurred. Current regulation allows boats to enter the brood enclosure and snag sockeye salmon available as brood from shore.

Maintaining barrier seine integrity is a primary concern and goal while the barrier seine is in place. Main Bay staff conduct weekly inspections for rips or areas where fish may leak. Staff can accomplish this from the shore, from a skiff, and by snorkeling at the seine/water surface.

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In 2023, PWSAC increased to weekly dive inspections and snag hook removals, adding costs to the Main Bay operation. PWSAC also coordinated inspections with the dive contractor after heavy weekend traffic. Unfortunately, these efforts were insufficient to remove problematic snagging gear and maintain barrier seine integrity.

Removing entanglements poses significant risk of injury to staff and contractors. This risk continues during contractor removal and offload of the seine as well as during staff cleaning and mending for storage.

The Alaska Board of Fisheries addressed a proposal in 2014 to close sport fishing inside a line 100 feet seaward of the Main Bay hatchery broodstock seine. The proposal was adopted with substitute language establishing the current regulation that all waters inside a line 60 feet seaward of the broodstock seine be closed to sport fishing from a vessel.

Main Bay Hatchery currently requires approximately 5,550 females and 3,700 male sockeye salmon for broodstock to perpetuate the Main Bay sockeye salmon run for all user groups. The goal each year is to estimate that number behind the barrier seine and proportionally represent run-timing in fish available as brood stock. When barrier seine integrity is compromised and large leaks occur, PWSAC is unable to manage the proportional run-timing of broodstock.

As fish available for brood mature, they are allowed to enter the Main Bay brood pond via a fish ladder. When that occurs, sockeye salmon are counted and sorted by staff as male or female. Once all brood required for the eggtake goal has been passed into the brood pond, the barrier seine can be removed. This generally occurs on or before July 15th. By this date, surplus fish behind the barrier seine (>16,000 avg) have matured and lost value to common property fisheries as the flesh quality has deteriorated. This is equivalent to the loss of 2,667 bag limits and/or more than \$110,000 to PWSAC cost recovery or the commercial fleet (4.7 lb average at \$1.50/lb).

During the sorting process, excess males, excess females, jacks, and any fish with open wounds are culled according to the ADF&G sockeye salmon culture protocol. The likelihood of Infectious Hematopoietic Necrosis virus (IHNV) horizontal transmission (adult fish to adult fish) increases with open wounds. IHNV is endemic to Alaskan sockeye salmon and can cause extensive mortality and loss in a hatchery setting. Main Bay Hatchery's success has been through resolute staff's rigorous adherence to the ADF&G sockeye salmon culture policy.

PWSAC takes any loss of fishing time or area to all user groups seriously. PWSAC would only consider such an action when it is clear that not doing so will cause harm to PWSAC operations and ultimately to user groups PWSAC serves. Proposal 81 was coordinated to keep the current line of 60 feet but eliminate casting towards the barrier seine. For those who would not follow the regulation, enforcement will be necessary as they will still be within casting range of the barrier seine and their snagging hooks could still become entangled with the barrier seine.

We look forward to working with Board of Fish members to adopt regulation that will work to maintain orderly fisheries for all user groups and Main Bay Hatchery operations.

Sincerely,



Geoff Clark
General Manager/CEO

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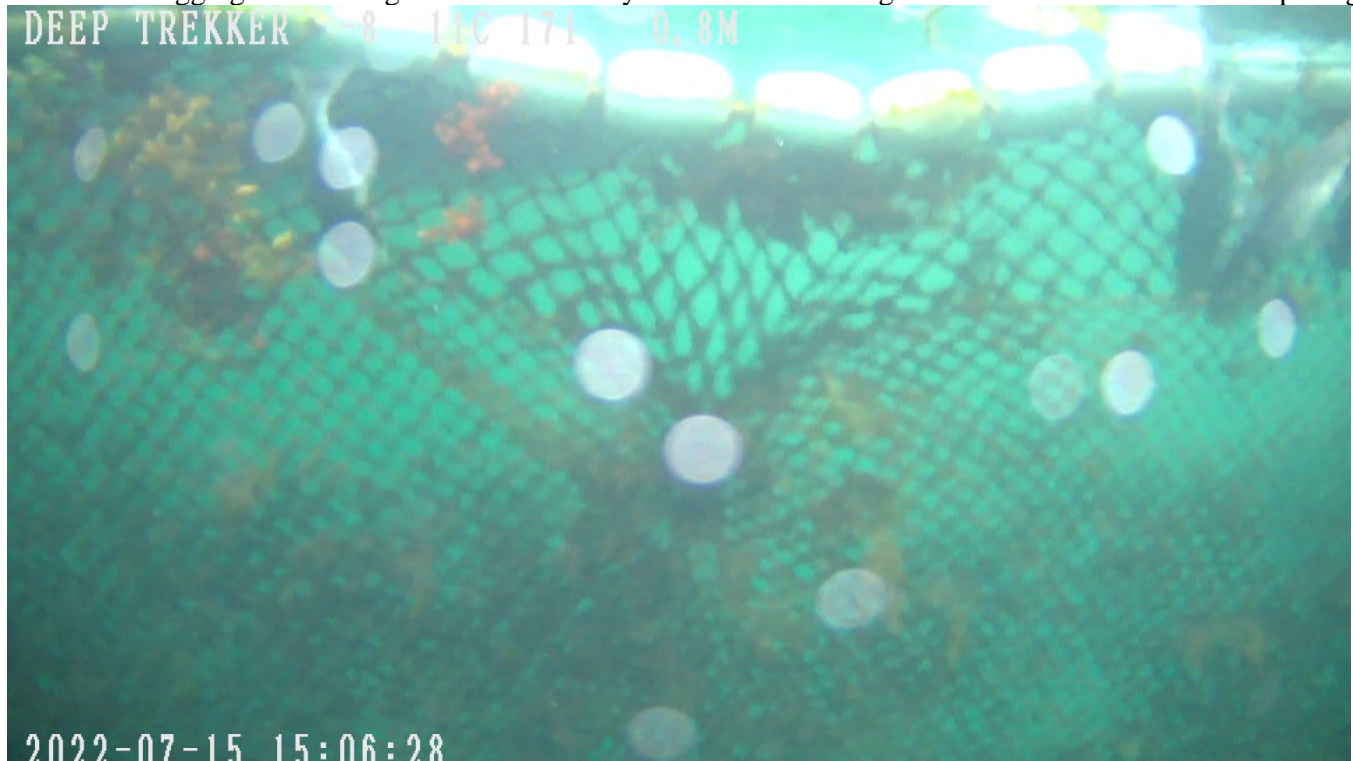
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Table 1. Main Bay Broodstock Collection and Loss to Cost Recovery and/or Common Property Fisheries

		Broodstock/ Escapement	Broodstock	Loss to Fisheries
2014		84,324	8,940	75,384
2015		31,255	8,940	22,315
2016		9,846	8,940	906
2017		48,535	8,940	39,595
2018		11,640	8,940	2,700
2019		9,269	8,940	329
2020		9,735	8,940	795
2021		15,498	8,940	6,558
2022		10,794	9,250	1,544
2023		19,828	9,250	10,578
2024	<i>(Preliminary)</i>	33,633	15,099	18,534
Average 2014-2024		25,851		16,294

Picture 1. Snagging hook entangled in the Main Bay barrier seine causing the corks to sink and allow fish passage



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Picture 2. Snagging hooks and line removed from Main Bay barrier seine.



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Picture 3. Snagging hook entangled in Main Bay barrier seine.



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Picture 4. Multiple snagging hooks entangled in Main Bay barrier seine.



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Picture 5. Snagging hook entangled in Main Bay barrier seine.



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Picture 6. Multiple snagging hooks entangled in the Main Bay barrier seine.



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Picture 7. Shore sport fishing inside the 60-foot line and fishing directly on the barrier seine.



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Picture 8. Shore sport fishing inside the 60-foot line and fishing directly on the barrier seine.



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Picture 9. Sport fishing at Main Bay Hatchery.



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Picture 10. Sport fishing at Main Bay.



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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, drift 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.

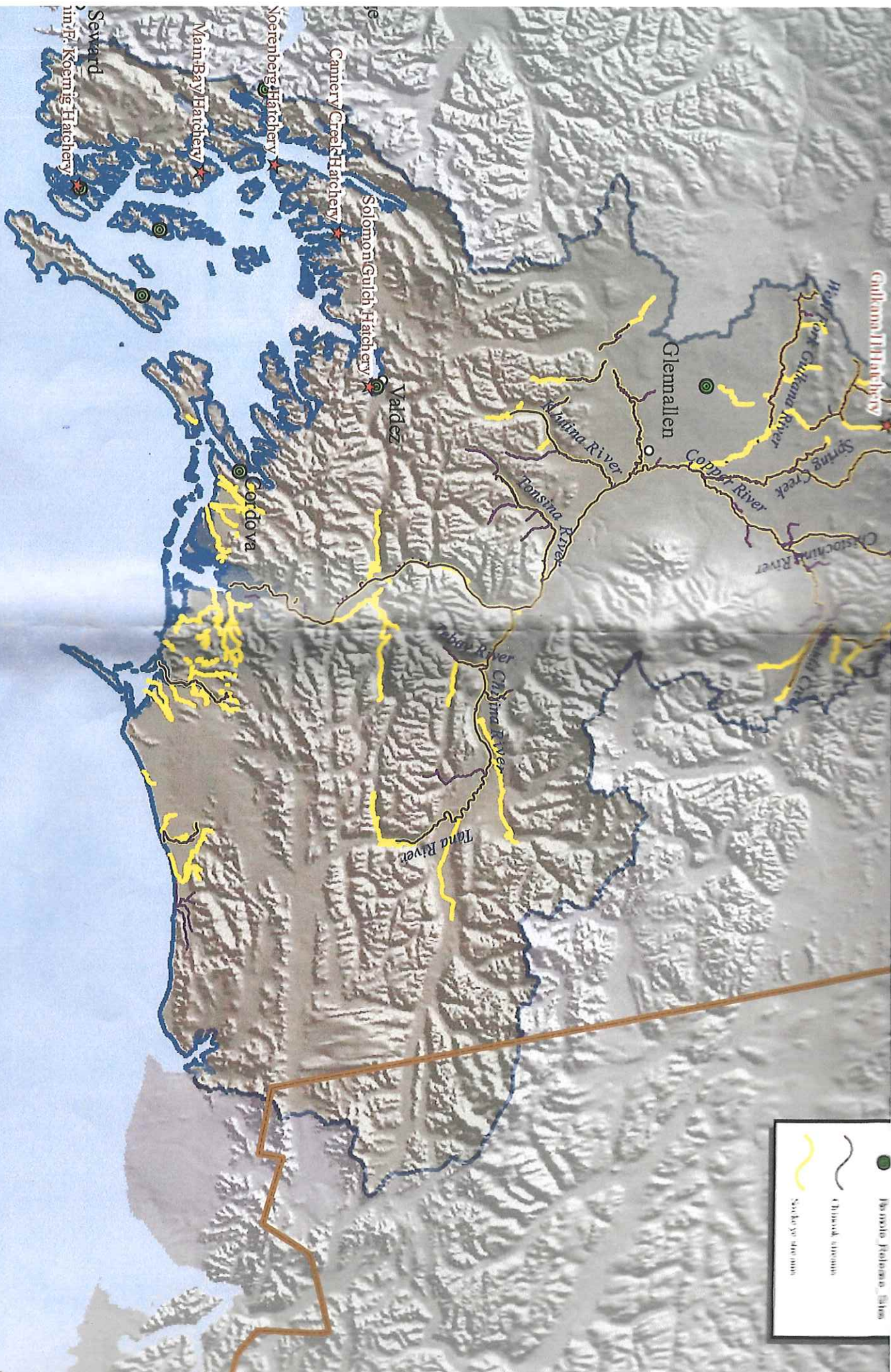
They would hunt the seals up the Copper River, looking for where they were hauled out in large numbers. Then they would run fast and loud near the sand bar, driving the seals into the water. The adult seals would submerge and depth charges were thrown off the skiff, to sink and kill the seals by the concussion. The pups, being too young to dive, were hunted down and shot with shotguns.

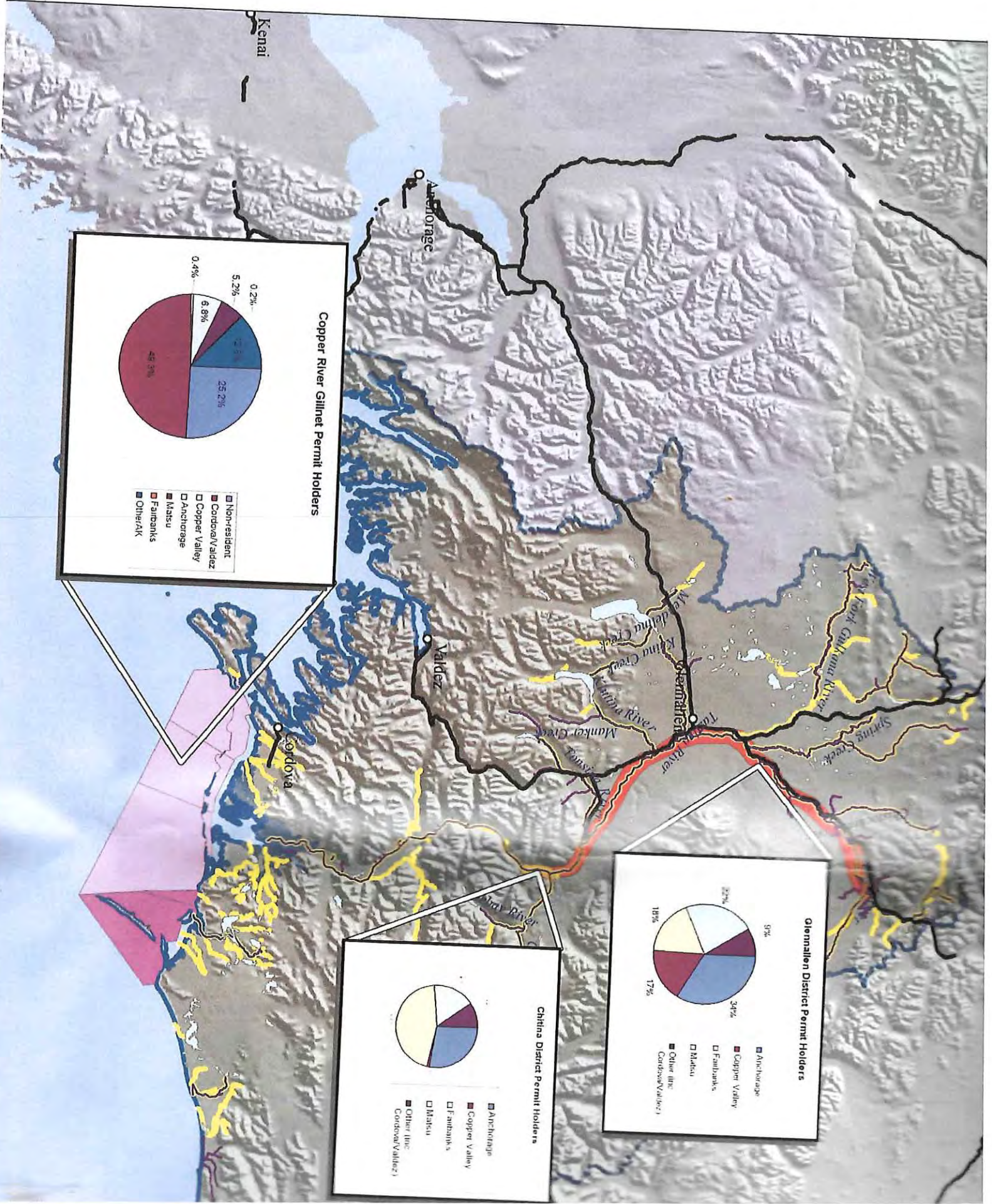
Kenneth W. Pitcher, an ADF&G biologist out of the Anchorage office reported "in 1977, nearly 18 years after cessation of control activities (dynamite), fishermen are again experiencing significant depredation problems indicating considerable recovery of the population."

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.

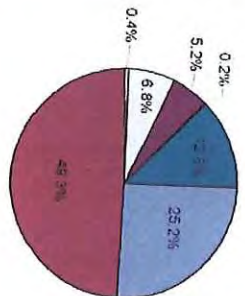
Unlike some areas of the State, PWS and the Copper River Delta didn't receive continuous, intensive hunting pressure during the mid-1960's. Hunting effort was related to activities in the fishing industry. Most seal hunting was conducted by fishermen during the closed fishing seasons. The peak harvest 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!

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Miles



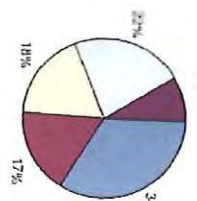


Copper River Gillnet Permit Holders



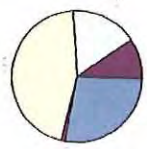
- Non-resident
- Cordova/Valdez
- Copper Valley
- Anchorage
- Matu
- Fairbanks
- Other/AK

Olenak District Permit Holders

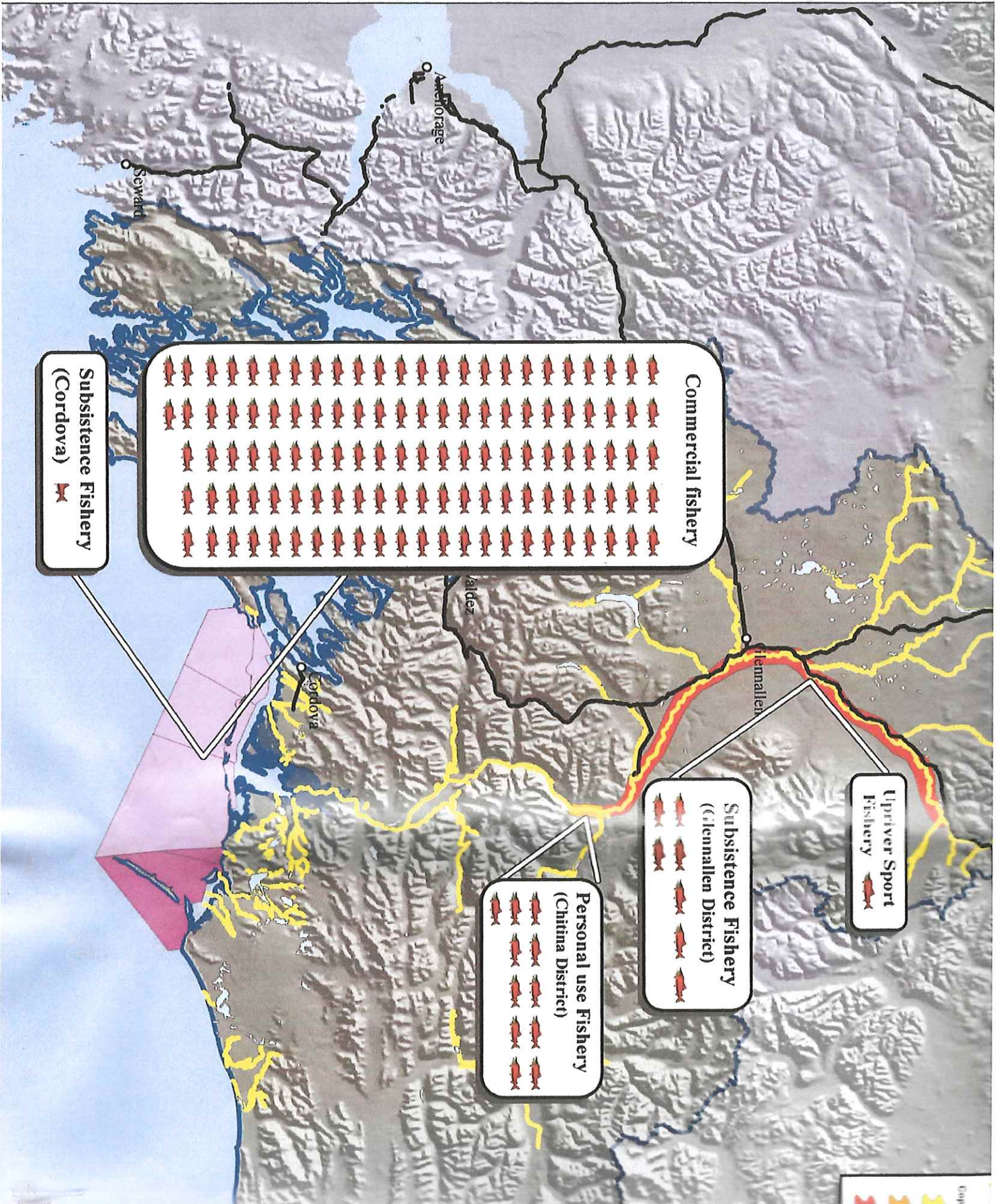


- Anchorage
- Copper Valley
- Fairbanks
- Matu
- Other (the Cordova/Valdez)

Chitina District Permit Holders



- Anchorage
- Copper Valley
- Fairbanks
- Matu
- Other (the Cordova/Valdez)



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 Houdobro 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. Jl 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

[REDACTED]

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
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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

A solid black rectangular box used to redact the signature of 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

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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

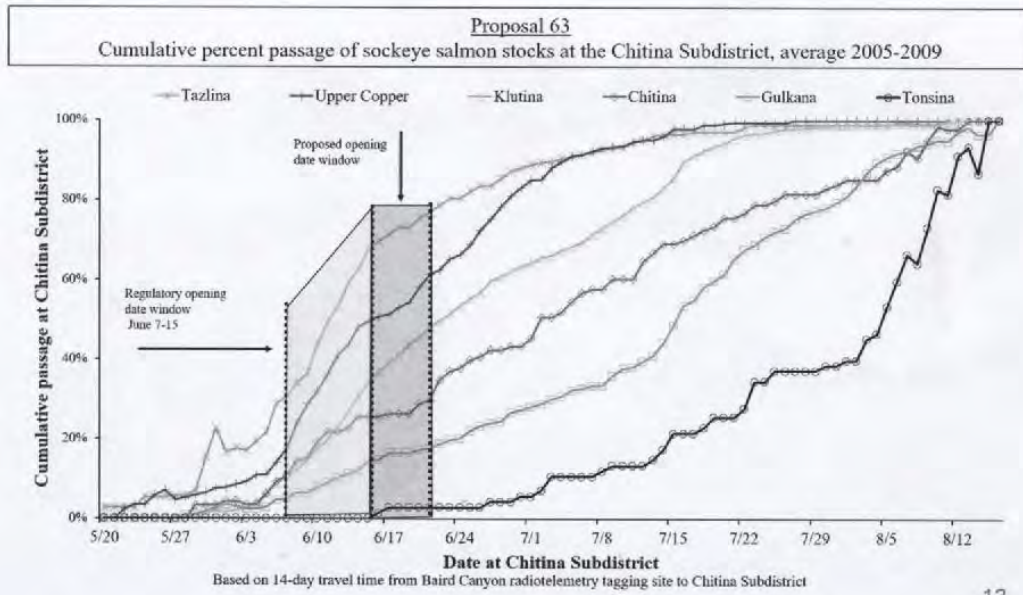
This is a CDA submitted proposal and the proposal language explains our stance. A map showing the existing and new boundary plus the existing short drift area is in **attachment D**.

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

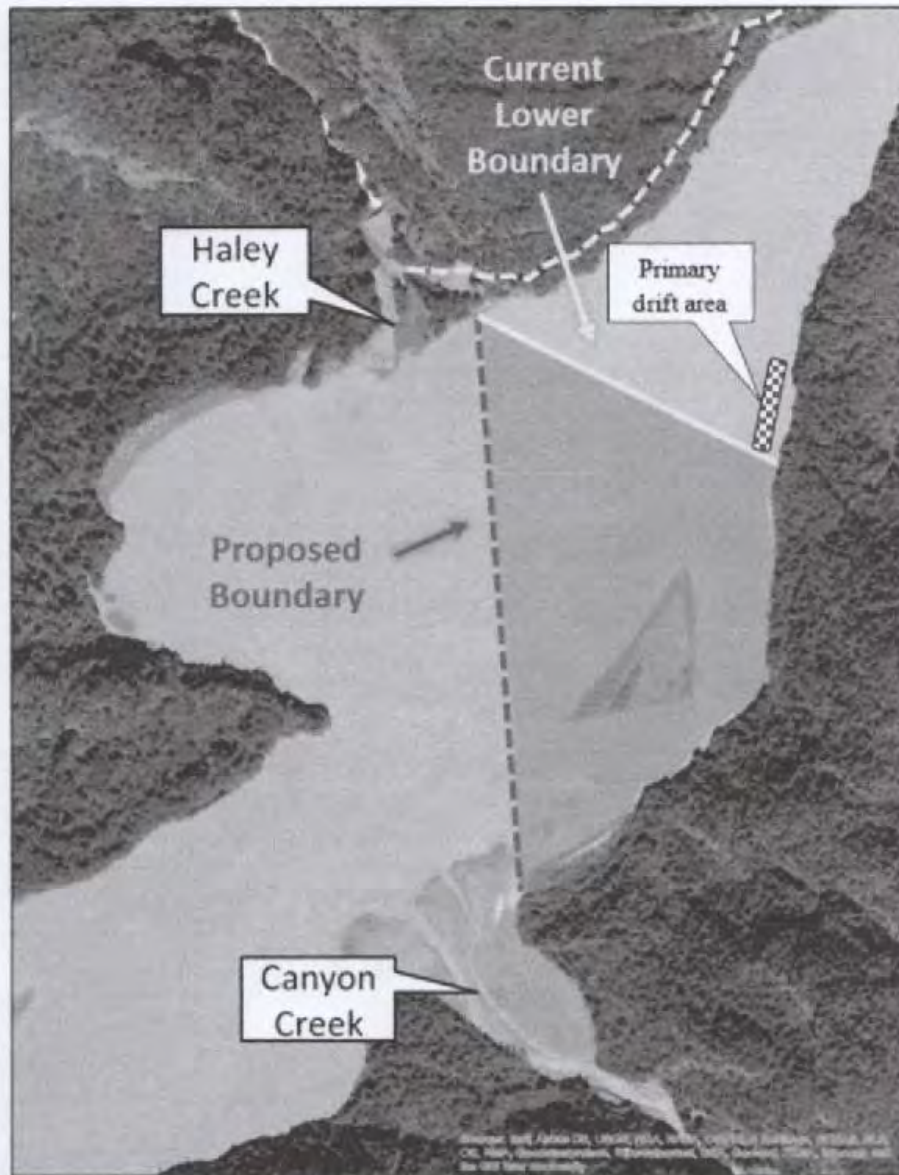
DATA FROM F&G FOR HOUSEHOLDS ACQUIRING BOTH A UCI (SOUTHCENTRAL) AND CHITINA P.U. DIPNET PERMIT

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:

ADF&G. 2024. Chinook Salmon Research Initiative: Copper River Chinook Salmon Historical Escapement 1980 to 2023.

https://www.adfg.alaska.gov/index.cfm?adfg=chinookinitiative_copper.historical. Retrieved October 19, 2024.

Hinch, S.G., N.N. Bett, E.J. Eliason, A.P. Farrell, S.J. Cooke, and D.A. Patterson. 2021. Exceptionally high mortality of adult female salmon: a large-scale pattern and conservation concern. *Can. J. Fish. Aquat. Sci.* 78: 639–654.

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.

Lubejko, M. and J. Parker. 2022. Issue Profile: A review of temperature-based fishing restrictions. Maine Department of Inland Fisheries and Wildlife. Augusta, ME.

https://www.maine.gov/ifw/docs/Issue%20Profile_%20A%20Review%20of%20Temperature%20based%20Fishing%20Restrictions_Final.pdf

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

A solid black rectangular box used to redact the signature of 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



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 fishing 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 GHLL is not being fully harvested, and that therefore a surplus supports reallocating leftover GHLL 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 GHLL.

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

A solid black rectangular box used to redact the signature of Steve Tutt.

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

Mailing Address: P.O. Box 20229, Juneau AK 99802-0229

Phone: (907) 586-2820

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

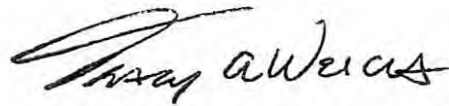
sustainable wild stocks in the region. This proposal would disrupt nearly 50 years of management and collaboration between ADF&G and the private non-profit hatchery operators and disregard the permitting that requires the hatcheries to minimize adverse effects on wild stocks.

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

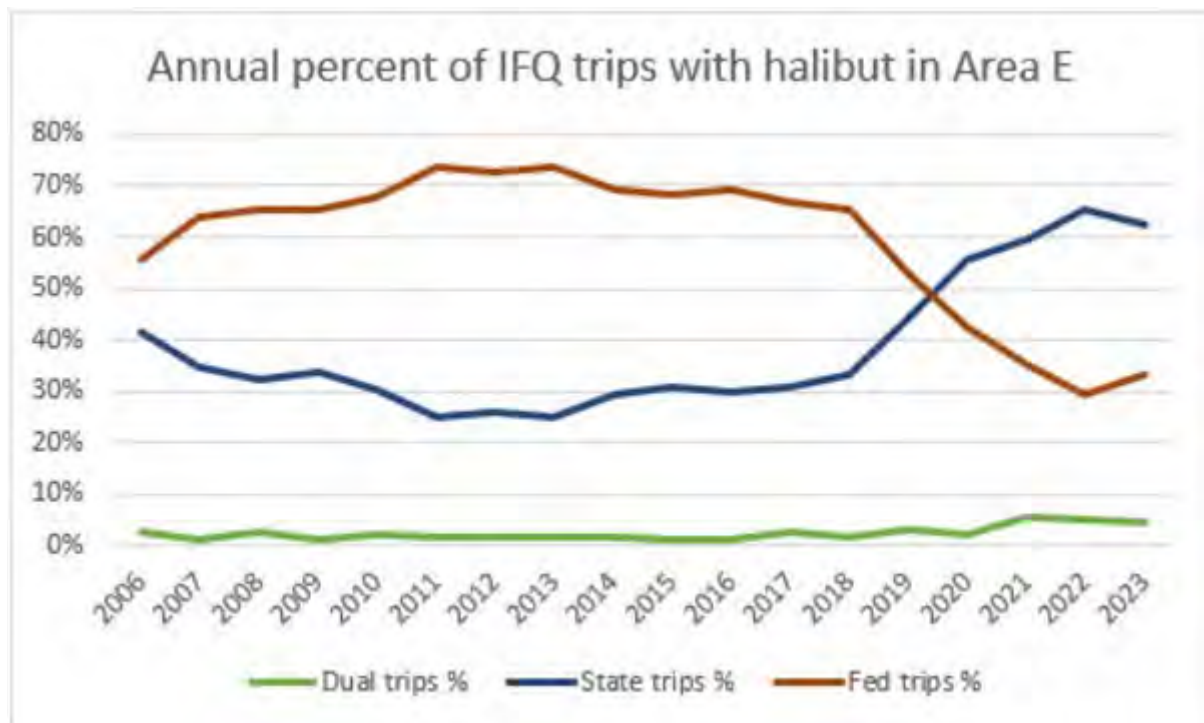
² ADF&G Prince William Sound Registration Area E Groundfish Fisheries Management Report, 2021–2023 Table 2

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 GH. The average rockfish GH was only exceeded in five of those ten years. In 2017, 2018, 2019, 2020 and 2021, the GH 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 GH 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 GH.

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.

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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.

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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,

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 live 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.

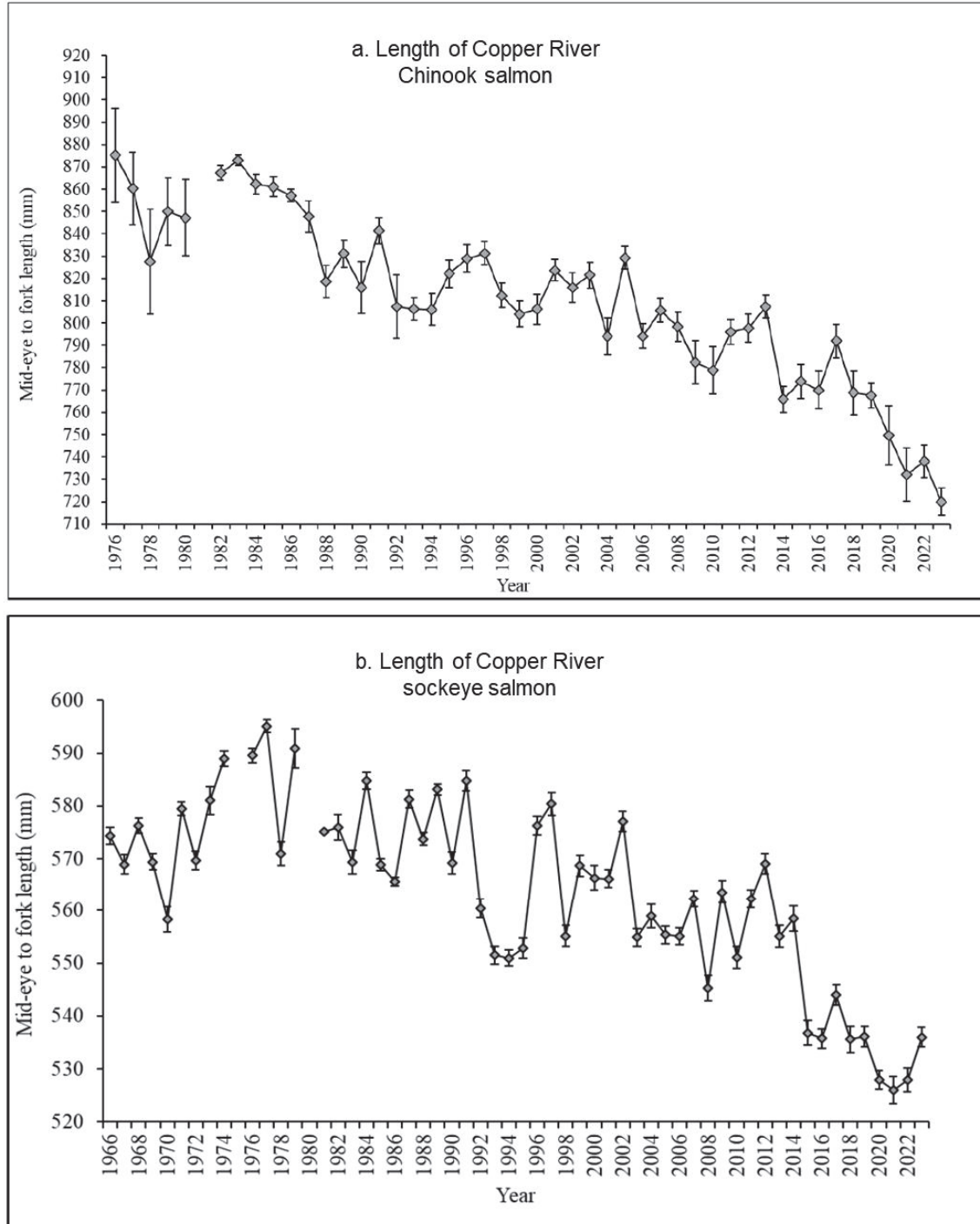


Figure 1. Length at age (1.3) for Copper River drift gillnet (a) Chinook salmon, 1976-2023, and (b) sockeye salmon, 1966-2023 (from Botz et al. 2024).

- 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

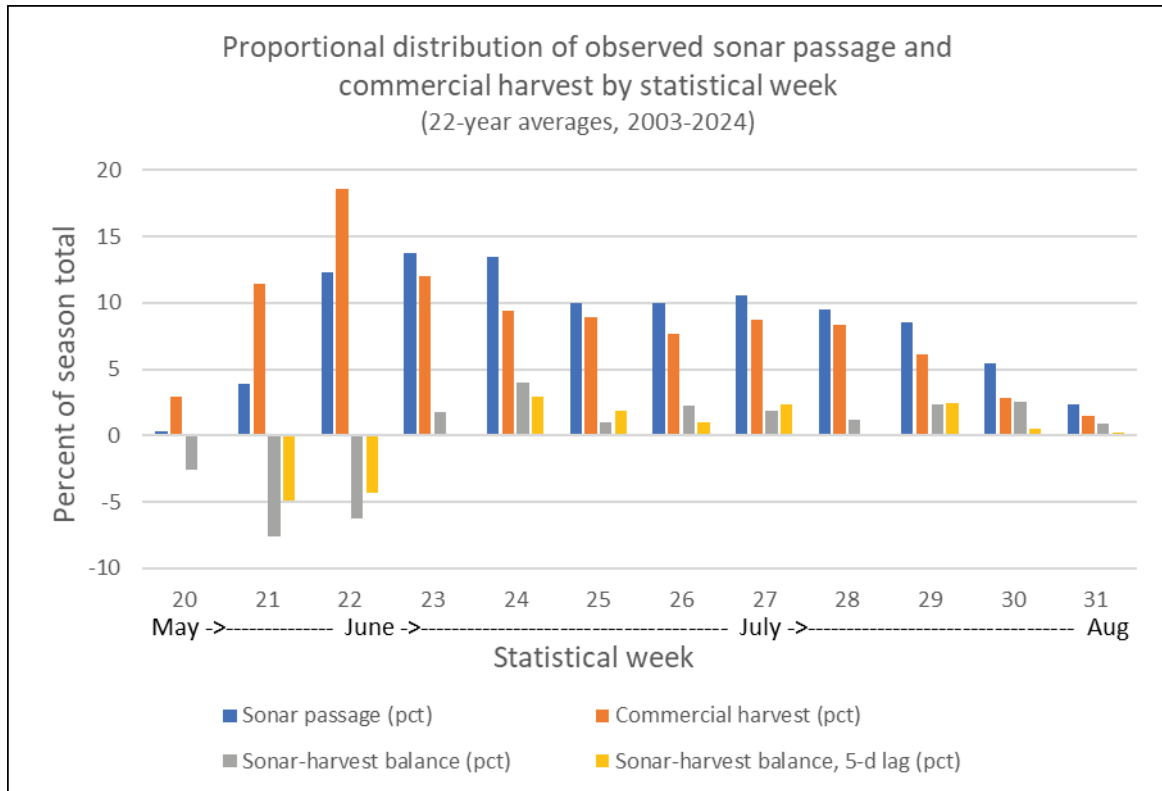


Figure 2. Average proportional distribution (percent of season totals) of observed Miles Lake sonar passage and Copper River District commercial harvest (sockeye and Chinook salmon) by statistical week for the 22-year period 2003-2024 (derived from ADF&G data). Sonar-harvest balances are calculated as 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).

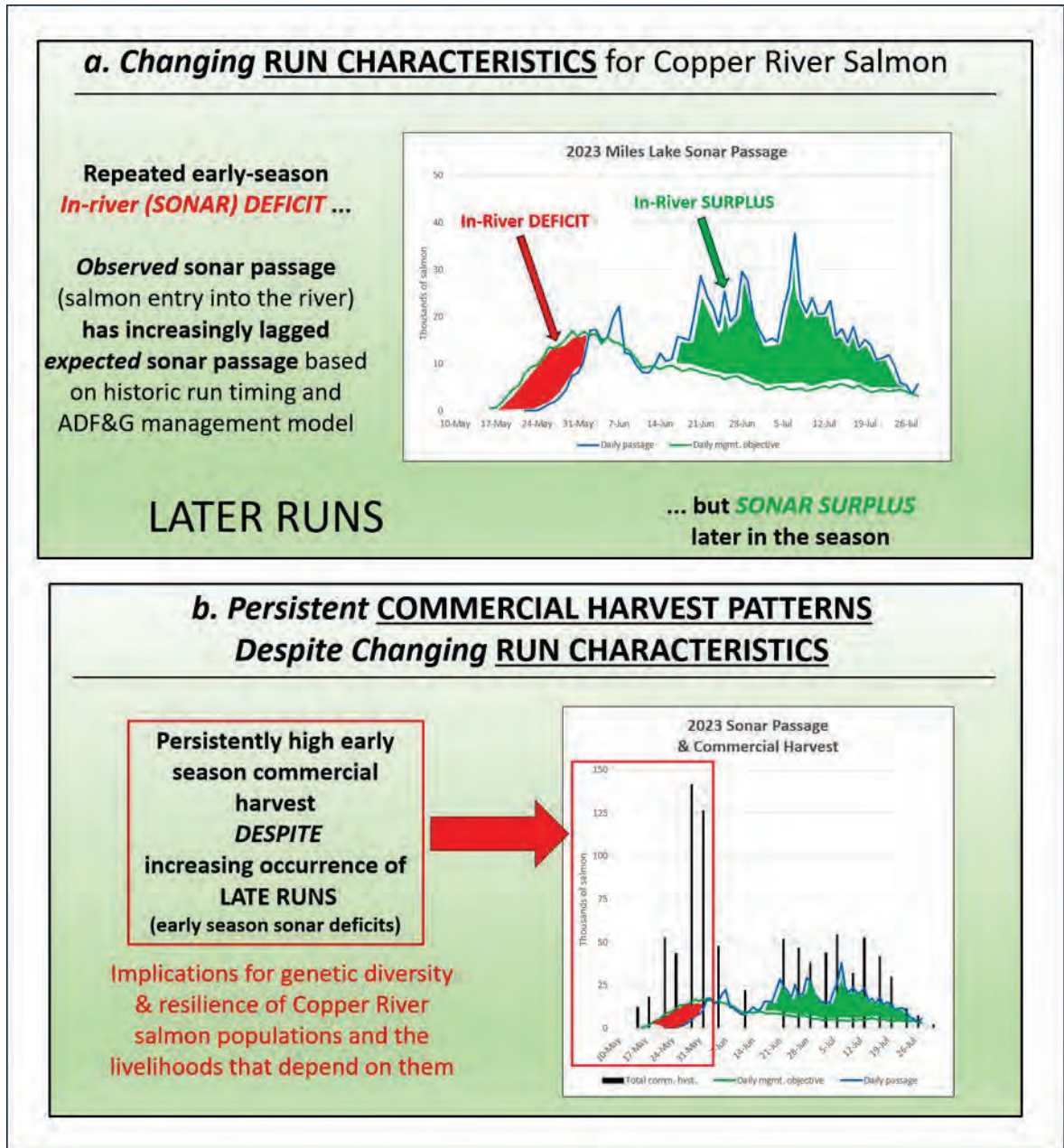


Figure 3. Graphics illustrating the late run in 2023, with (a) an early-season deficit in sonar passage (observed passage less than management objectives for passage) and in-river salmon, and (b) disproportionately high commercial harvest despite late run entry. See additional figures in Attachment D and tables in Attachment E.

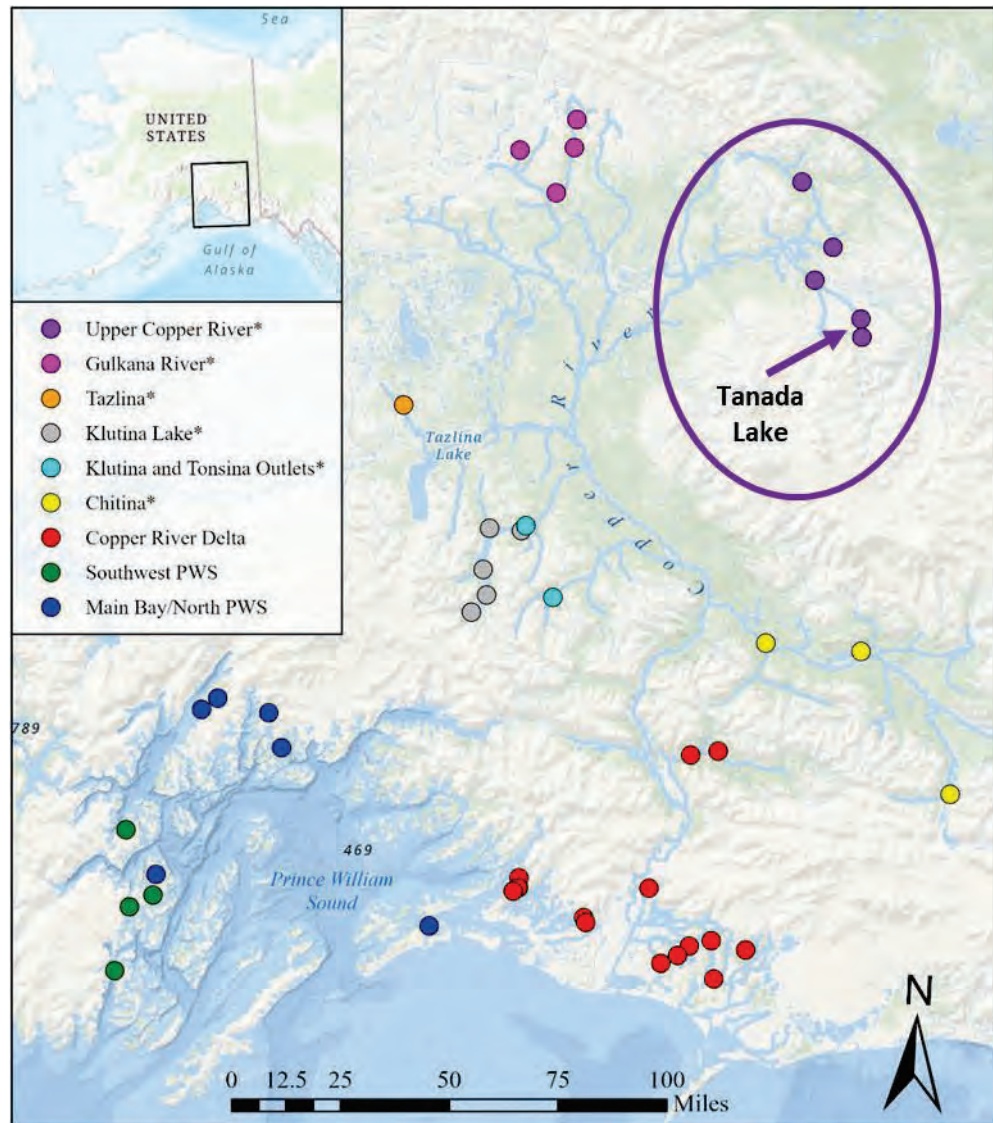


Figure 4. Map of the Copper River and Prince William Sound area showing the location of sockeye salmon baseline populations and their reporting group affiliations for genetic mixed stock analysis of Copper River sockeye commercial, personal use, and subsistence fishery harvests. All nine reporting groups 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.)

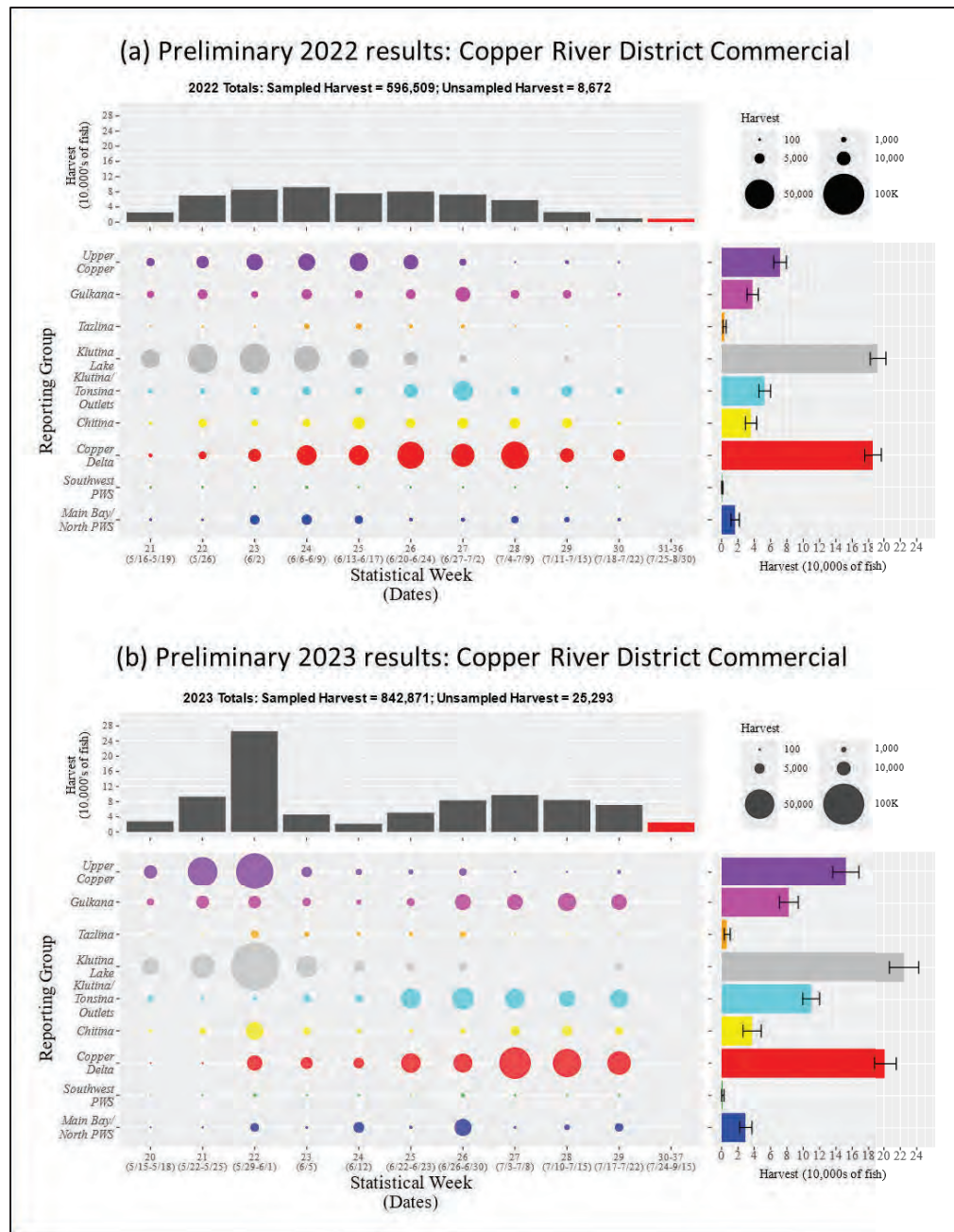


Figure 5. Preliminary Copper River District commercial sockeye salmon harvest estimates by reporting group and statistical week for 2022 (a) and 2023 (b), as presented by ADF&G during an April 2024 public meeting. Key: The bubble plot shows stock-specific harvest estimates (means) of sockeye salmon for 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.

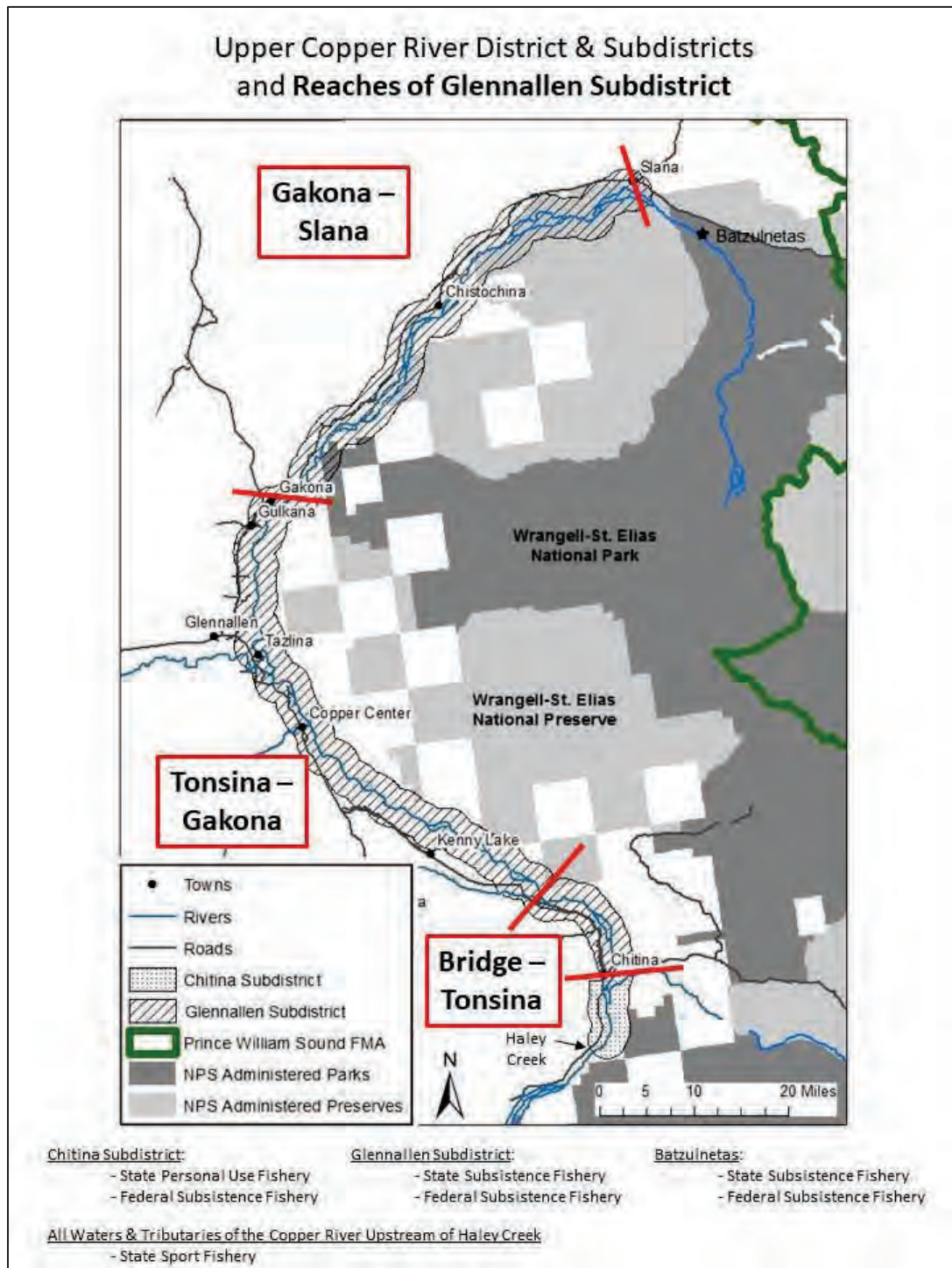


Fig. C1. Map showing three reaches (Bridge-Tonsina, Tonsina-Gakona, and Gakona-Slana, indicated by red demarcations) used for tracking patterns of subsistence harvest in the Glennallen Subdistrict.

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	GSD ³ return (total salmon)	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 permit	Avg. harvest per 100k inriver	Harvest per permit	Avg. harvest per 100k inriver	Harvest per permit	Avg. harvest per 100k inriver	Harvest per permit	Avg. harvest per 100k inriver	
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	17.3	14.6	17.3	
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	19.8	17.0	19.8	
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	22.5	19.6	22.5	
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	12.6	10.9	12.6	
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	10.9	9.6	10.9	
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	9.9	8.7	9.9	
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	8.5	7.2	8.5	
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	12.2	10.5	12.2	
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	8.7	7.8	8.7	
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	8.8	7.5	8.8	
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	8.7	7.6	8.7	
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	11.8	9.8	11.8	
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	13.9	11.3	13.9	
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	11.0	9.0	11.0	
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	18.2	16.1	18.2	
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	9.1	7.6	9.1	
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	16.0	13.6	16.0	
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	16.9	13.5	16.9	
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	18.5	14.8	18.5	
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	18.2	15.0	18.2	
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	13.1	11.3	13.1	
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	14.2	11.8	14.2	
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	15.8	12.9	15.8	
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	38.2	37.8	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	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	36.5	36.6	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			
		Permits		Avg. days		Total permit-days		Avg. days		Total permit-days		Avg. harvest per permit		Avg. harvest per permit		Avg. harvest per permit	
		fished	permitted	fished	permitted	fished	permitted	fished	permitted	fished	permitted	100k GSD return	per 100k inriver	100k GSD return	per 100k inriver	100k GSD return	per 100k inriver
2004	3.2	419	2.9	1,227	26	5.0	129	76.2	11.1	13.2	26	99.6	14.6	17.3	20	20	20
2005	-12.7	575,576	3.0	1,346	31	2.7	85	89.7	10.5	12.2	30	145.3	17.0	19.8	53	53	53
2006	-3.3	732,662	3.1	1,521	20	4.5	89	74.7	7.8	8.9	24	187.8	19.6	22.5	42	42	42
2007	-16.1	834,896	3.1	1,795	43	4.4	187	73.9	8.0	9.3	24	100.2	10.9	12.6	23	23	23
2008	-25.4	793,447	2.8	1,654	48	3.3	158	44.5	6.2	7.0	16	69.1	9.6	10.9	21	21	21
2009	-24.6	636,026	3.0	1,588	46	3.8	177	51.8	7.3	8.4	17	61.4	8.7	9.9	16	16	16
2010	-20.3	618,831	2.9	1,932	48	4.2	201	61.0	6.6	7.8	21	66.9	7.2	8.5	16	16	16
2011	-7.8	783,000	2.8	1,933	43	5.0	217	54.1	5.9	6.9	19	95.7	10.5	12.2	19	19	19
2012	-14.0	784,246	2.4	1,752	44	4.2	186	59.1	4.6	5.1	25	101.3	7.8	8.7	24	24	24
2013	-33.1	1,166,342	2.2	1,592	34	4.5	154	64.3	5.1	5.9	29	94.9	7.5	8.8	21	21	21
2014	-7.7	1,084,145	2.3	1,941	39	5.4	212	54.6	4.5	5.2	24	92.6	7.6	8.7	17	17	17
2015	-8.3	1,059,539	2.1	1,785	35	3.8	132	55.5	4.1	5.0	27	132.2	9.8	11.8	35	35	35
2016	-3.2	1,120,675	2.0	1,881	19	4.5	86	41.5	5.2	6.4	20	90.4	11.3	13.9	20	20	20
2017	-8.1	651,290	2.1	1,791	20	4.1	81	30.1	4.2	5.1	15	65.1	9.0	11.0	16	16	16
2018	-57.3	589,132	1.7	1,437	23	4.7	109	29.4	4.2	4.7	17	113.3	16.1	18.2	24	24	24
2019	-4.9	621,035	1.8	1,669	33	3.4	113	41.7	4.0	4.8	23	78.9	7.6	9.1	23	23	23
2020	-31.7	863,941	1.7	1,287	32	4.2	136	33.4	6.3	7.4	20	72.0	13.6	16.0	17	17	17
2021	-9.4	448,885	1.6	1,337	22	3.9	86	36.5	4.9	6.1	23	101.5	13.5	16.9	26	26	26
2022	-15.4	602,546	1.6	1,011	26	5.5	144	52.6	6.7	8.4	33	116.3	14.8	18.5	21	21	21
2023	-37.7	627,565	1.7	1,241	20	4.3	85	49.8	5.0	6.1	29	148.8	15.0	18.2	35	35	35
10-yr avg. 2004-2013	-15.4	817,208	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	25.5	25.5
10-yr avg. 2014-2023	-18.4	800,917.1	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	23.4	23.4
5-yr avg. 2019-2023	-19.8	740,181.6	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	24.4	24.4
10-yr CV ² 2004-2013	71.2	672,029.0	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	47.7	47.7
10-yr CV 2014-2023	97.5	24.0	11.0	20.6	26.9	15.6	34.2	23.8	19.1	20.7	23.8	26.5	27.0	27.0	29.6	29.6	29.6
5-yr CV 2019-2023	71.8	29.5	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	36.7	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, 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		Avg. days		Total permit-days	Permits		Avg. days		Total permit-days	Avg. harvest per 100K		Avg. harvest per 100K GSD		Harvest per day (catch per unit effort)	Avg. harvest per 100K		Avg. harvest per 100K GSD		Harvest per day (catch per unit effort)
		fished	permit	fished	permit		fished	permit	per	in/river		per	in/river	return	per		in/river	return	per	in/river	
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	7.9	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	98	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	77	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 - 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 & 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 balance¹	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 (total salmon)	GSD³ 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	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k <i>Inriver</i>	Avg. harvest per permit	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k GSD	Avg. harvest per permit return
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

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 & 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 (total salmon)	GSD ³ (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	Harvest per day fished (catch per unit effort)	Harvest per 100k <i>inriver</i>	Avg. harvest per permit	Avg. harvest per 100k GSD	Harvest per day fished (catch per unit effort)	Harvest per 100k <i>inriver</i>	Avg. harvest per permit	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	1,267,060	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	883,941	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 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 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 (total salmon)	GSD ³ return (total)	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	Harvest per day fished (catch per unit effort)	Avg. harvest per 100k <i>inriver</i>	Avg. harvest per permit	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	1,267,060	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 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		
	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)

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.

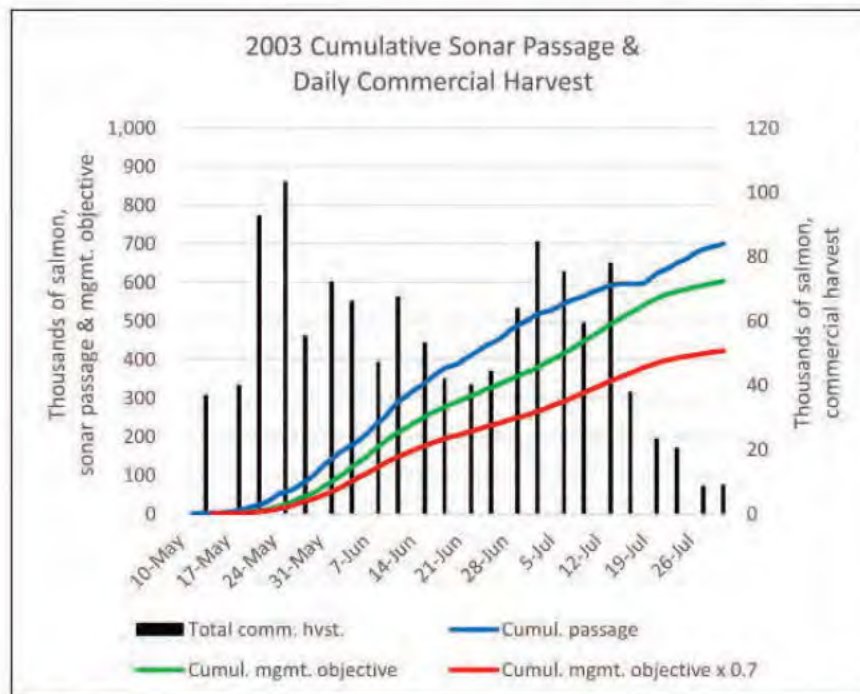
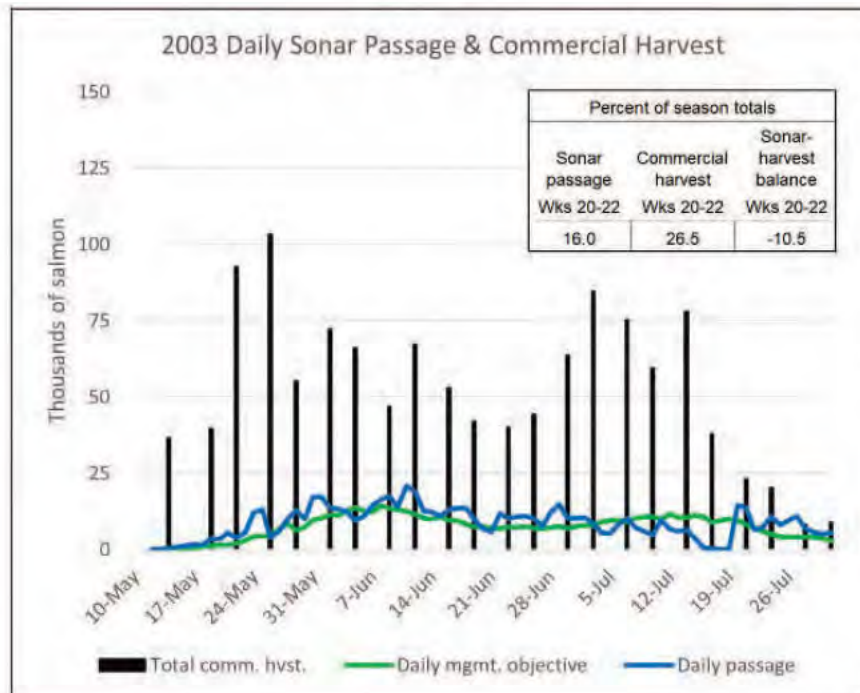
Explanatory notes:

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

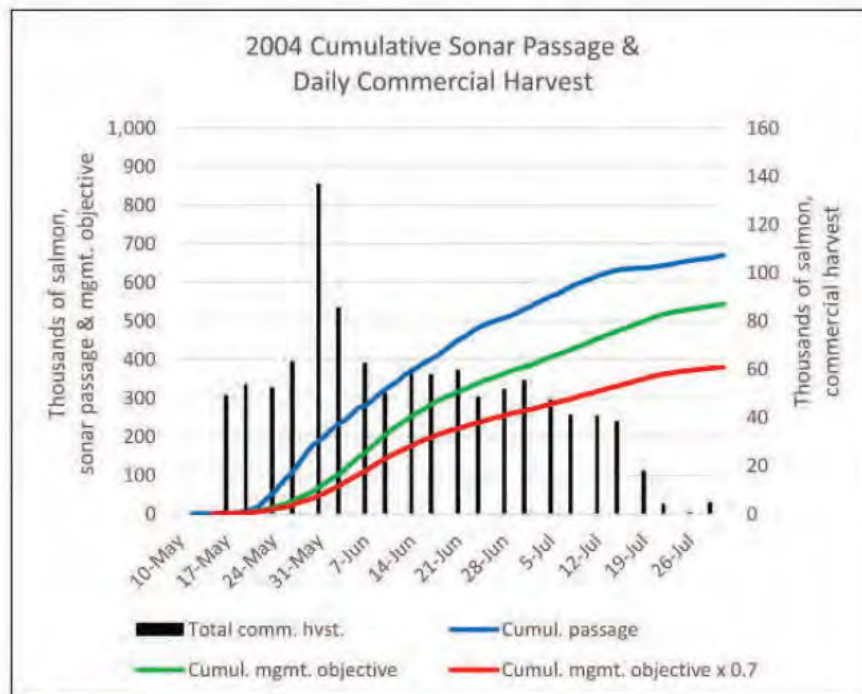
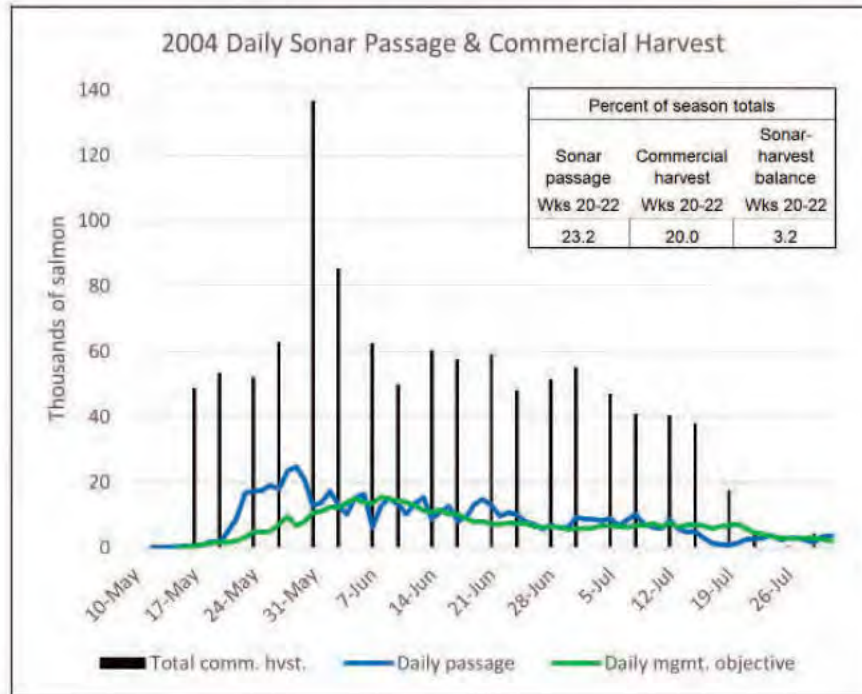
⁴ <https://www.adfg.alaska.gov/index.cfm?adfg=commercialbyareacopperriver.harvestsummary>

2003



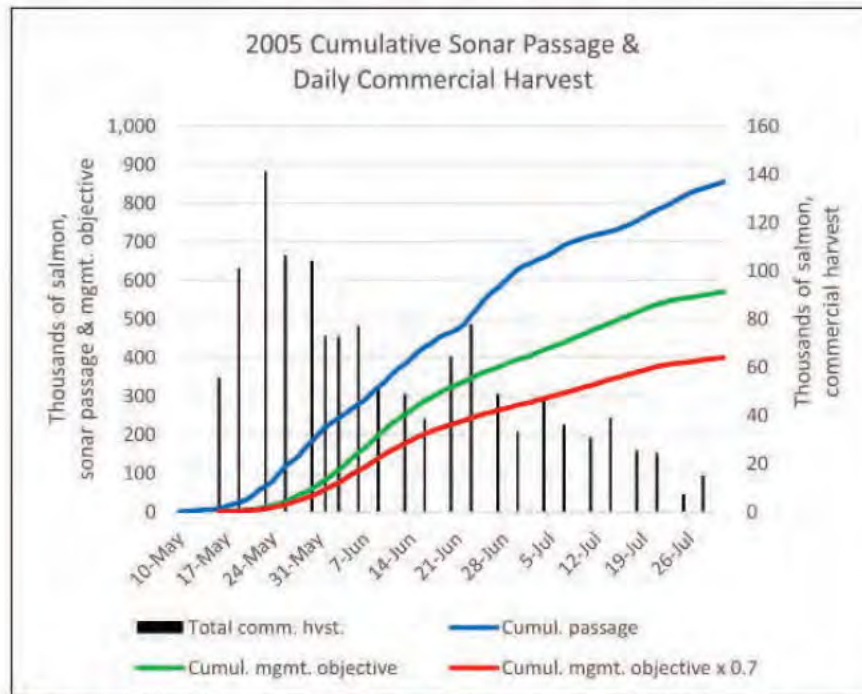
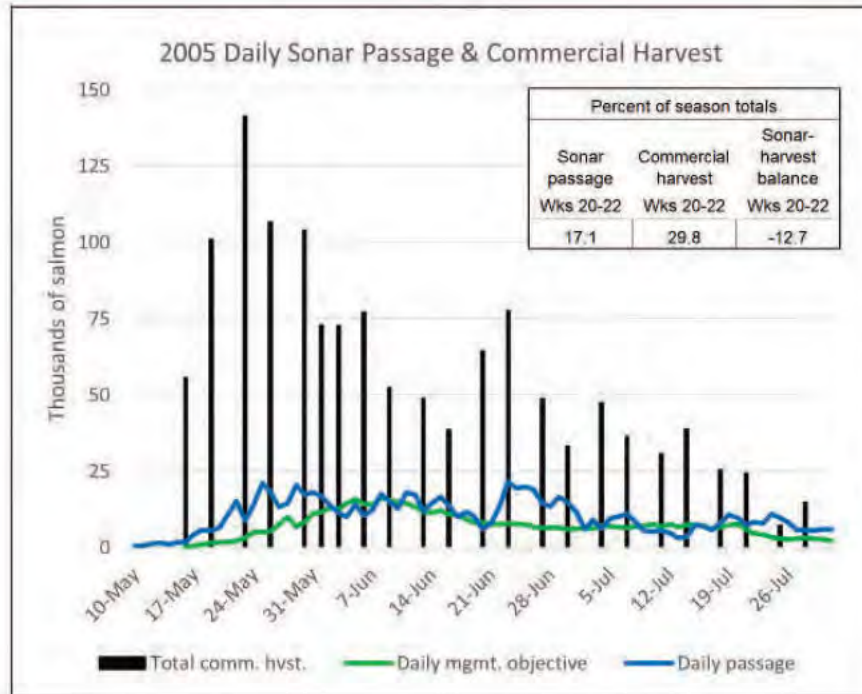
Data from Ashe et al. 2005a, Fishery Management Report No. 05-54

2004



Data from Ashe et al. 2005b, Fishery Management Report No. 05-65

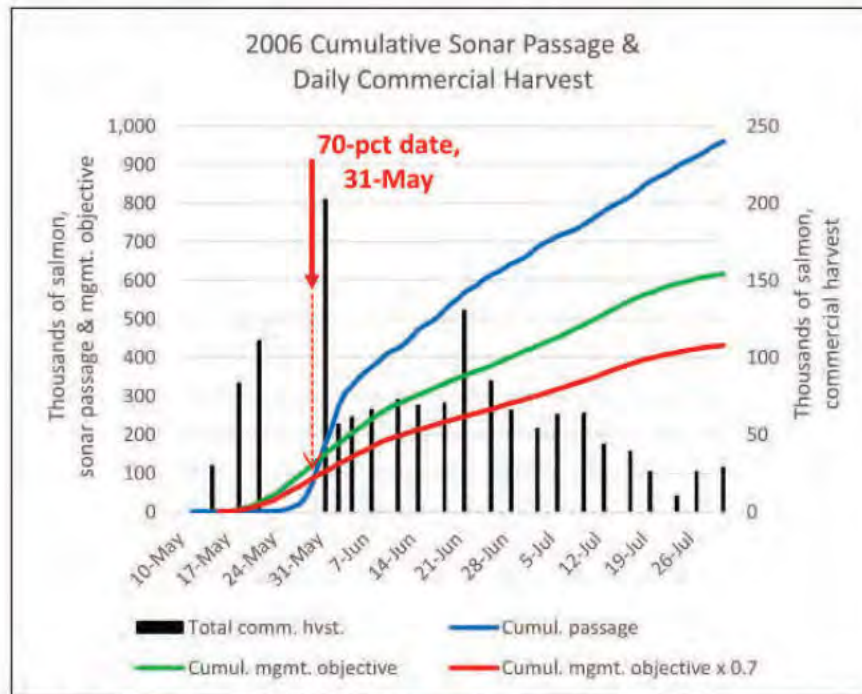
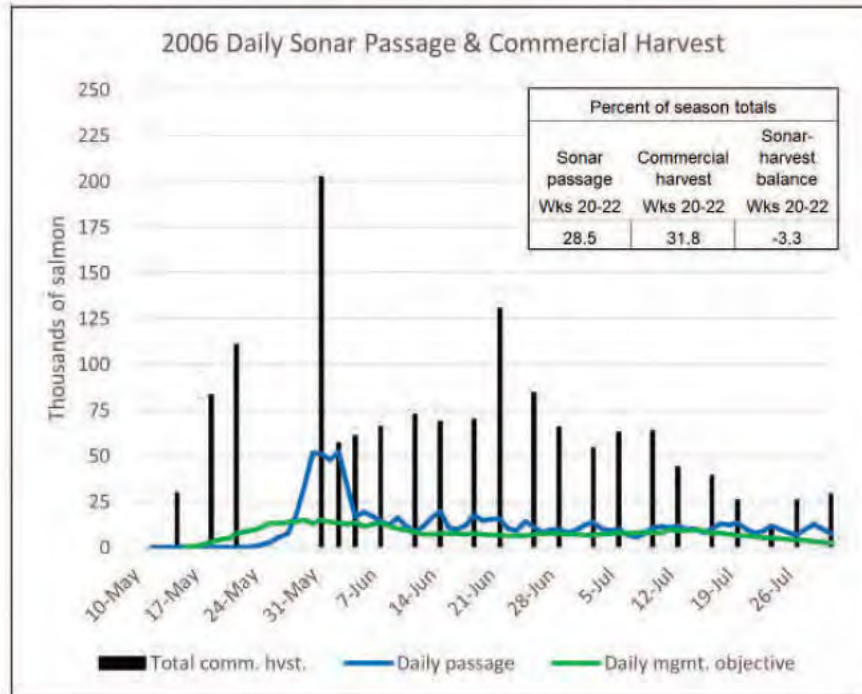
2005



Data from Hollowell et al. 2007, Fishery Management Report No. 07-33

2006**

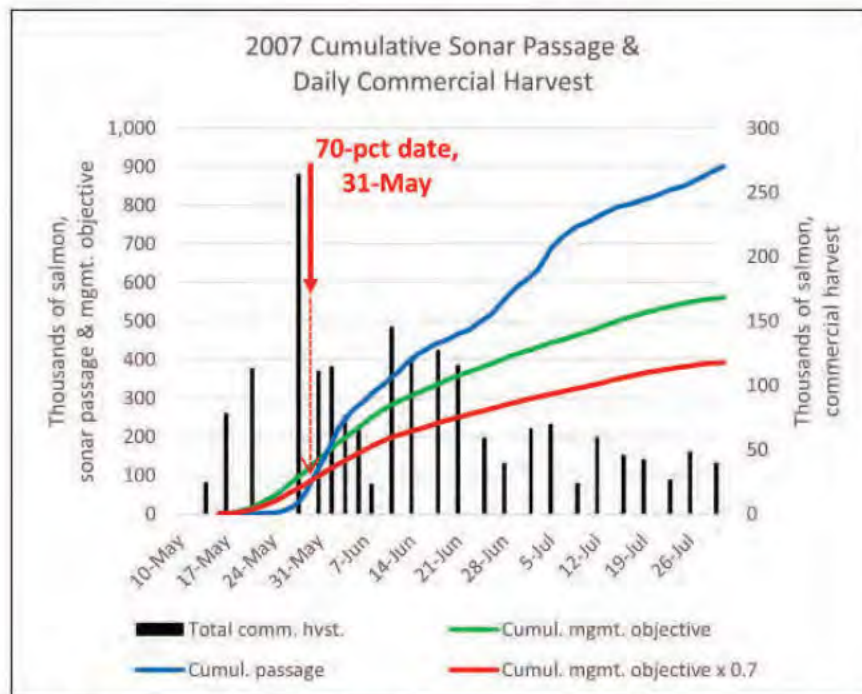
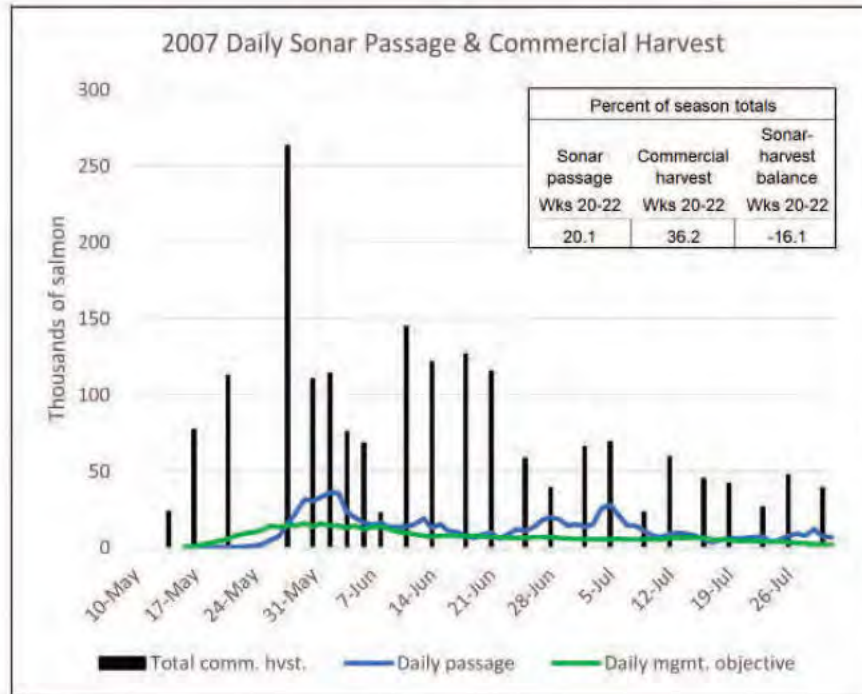
Note
different
y-axis



Data from Botz et al. 2008, Fishery Management Report No. 08-30

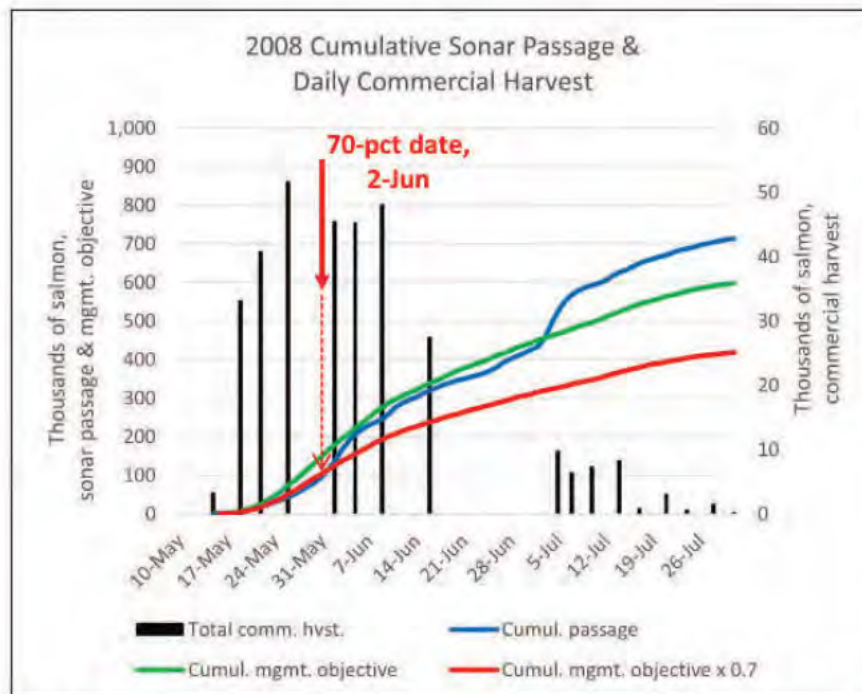
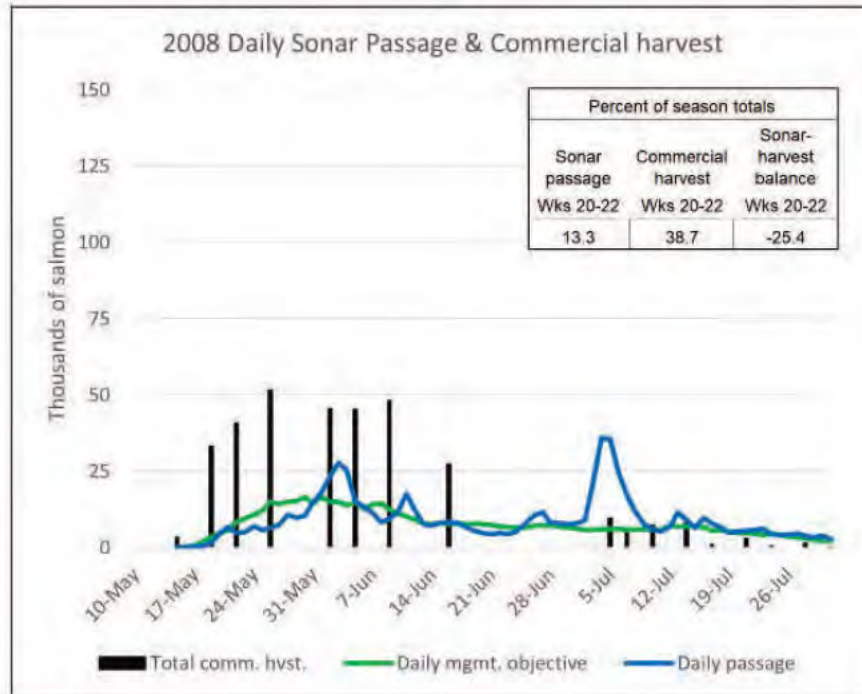
2007**

Note
different
y-axis



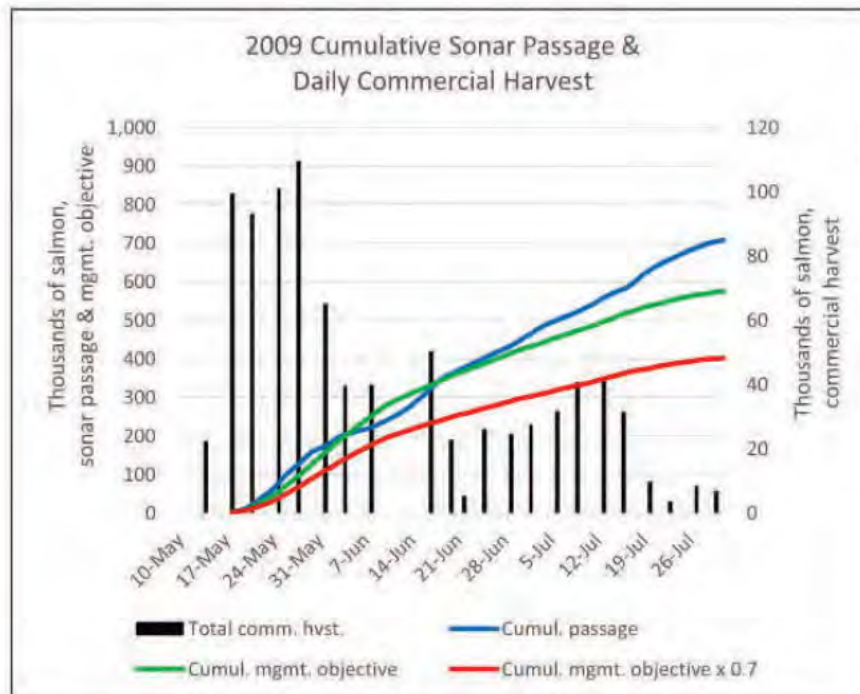
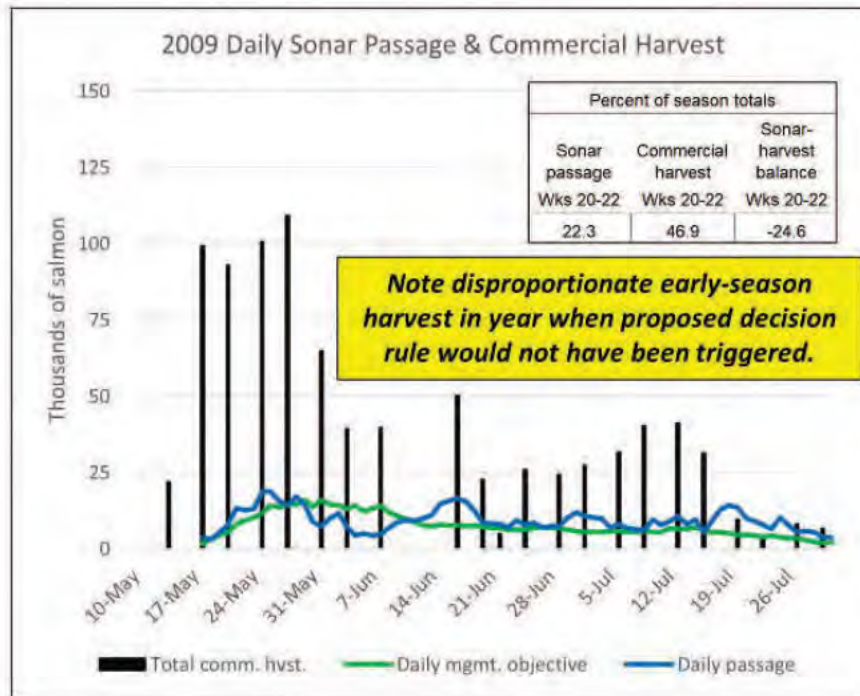
Data from Lewis et al. 2008, Fishery Management Report No. 08-53

2008*



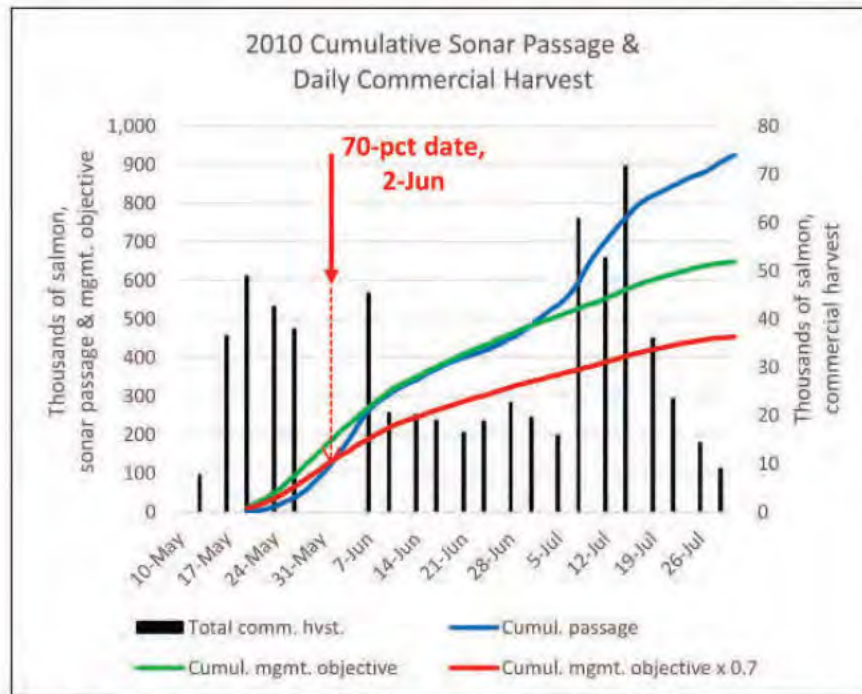
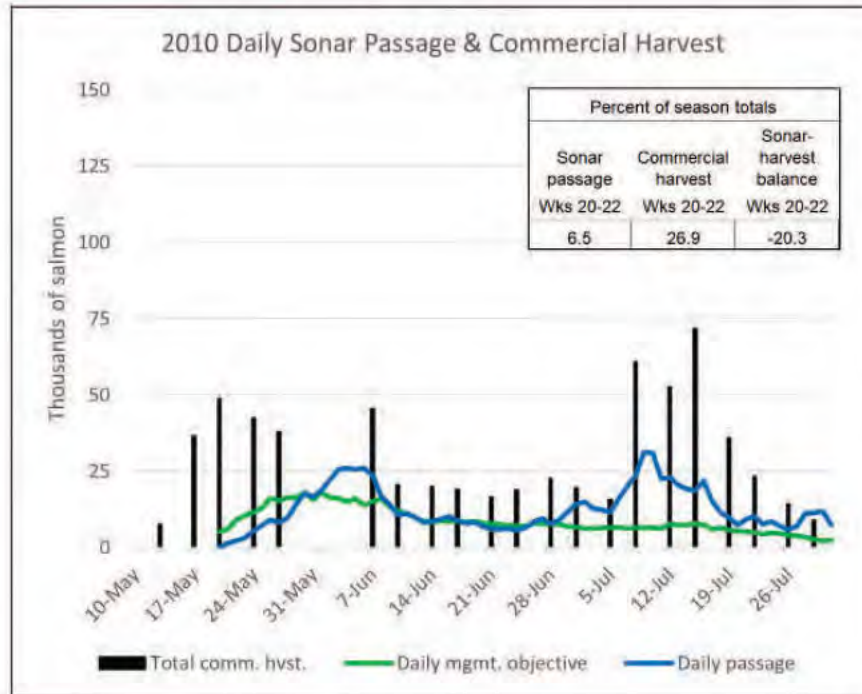
Data from Bell et al. 2010, Fishery Management Report No. 10-45

2009



Data from Botz et al. 2010, Fishery Management Report No. 10-55

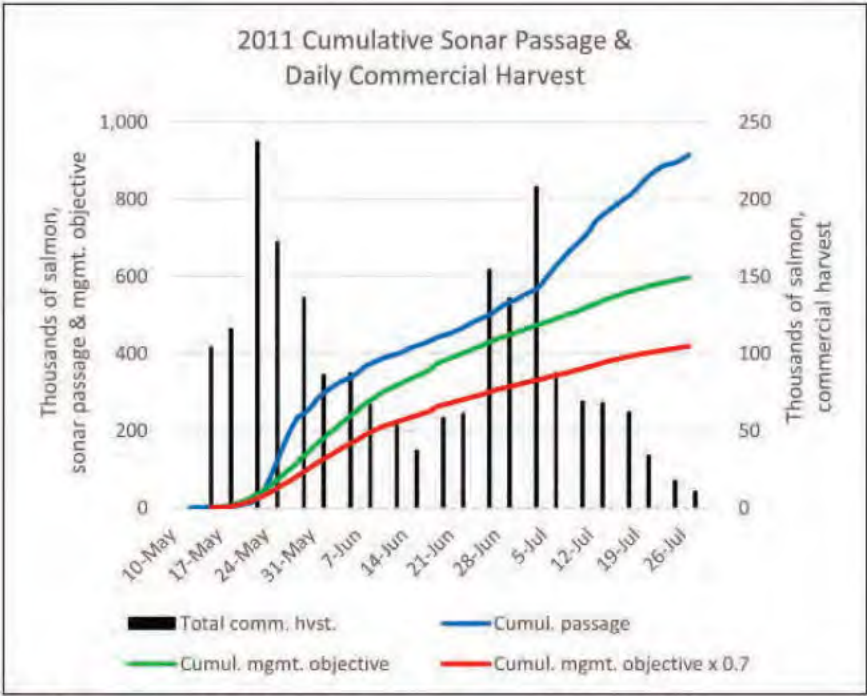
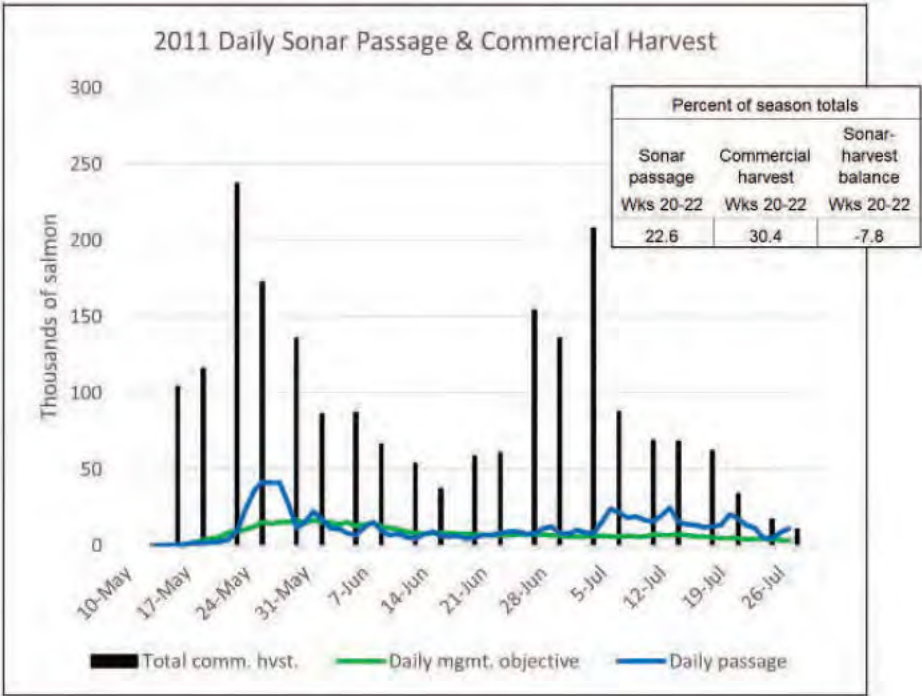
2010**



Data from Botz et al. 2012, Fishery Management Report No. 12-06

2011*

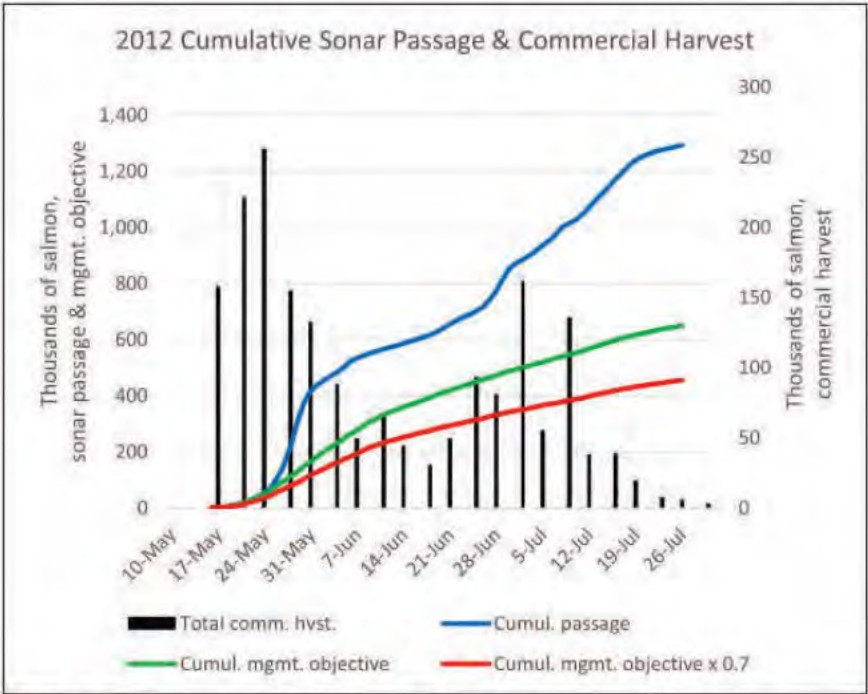
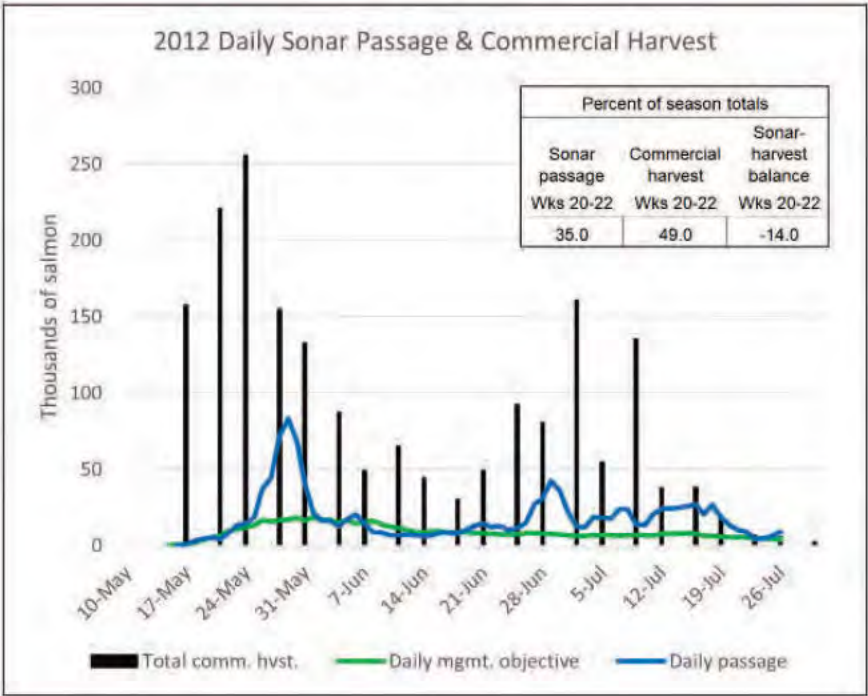
Note
different
y-axis



Data from Botz et al. 2013, Fishery Management Report No. 13-11

2012

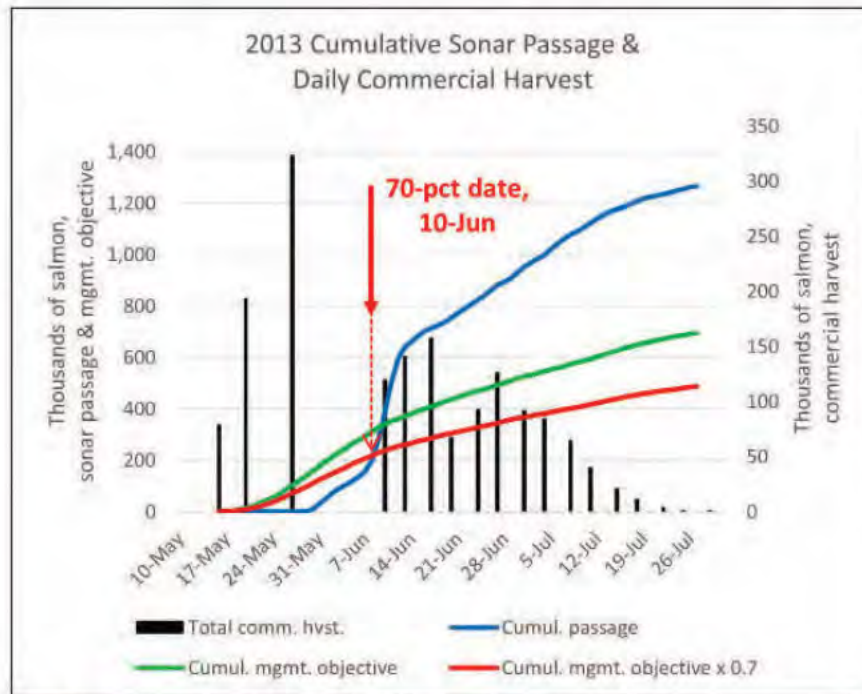
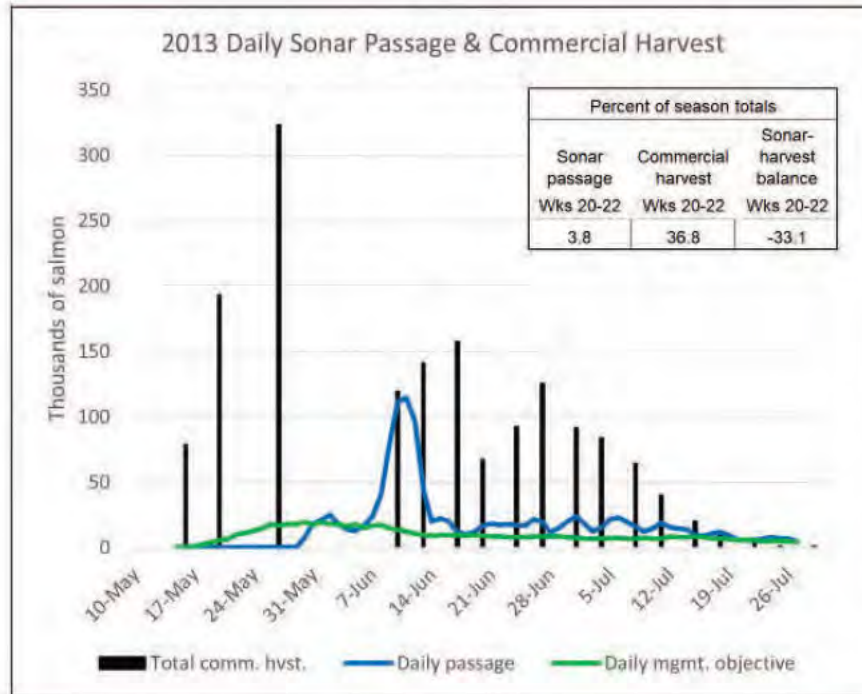
Note
different
y-axis



Data from Sheridan et al. 2013, Fishery Management Report No. 13-46

2013**

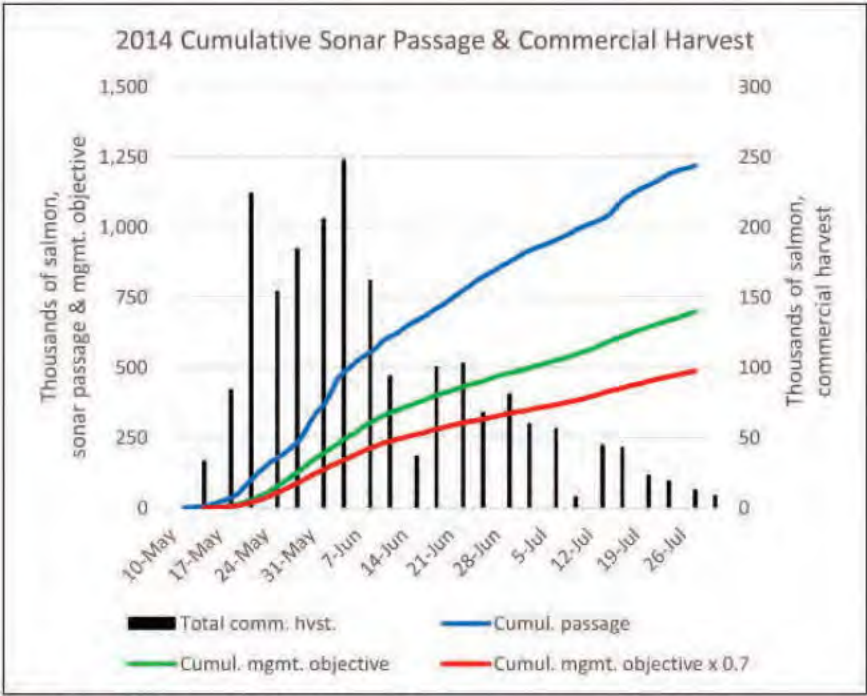
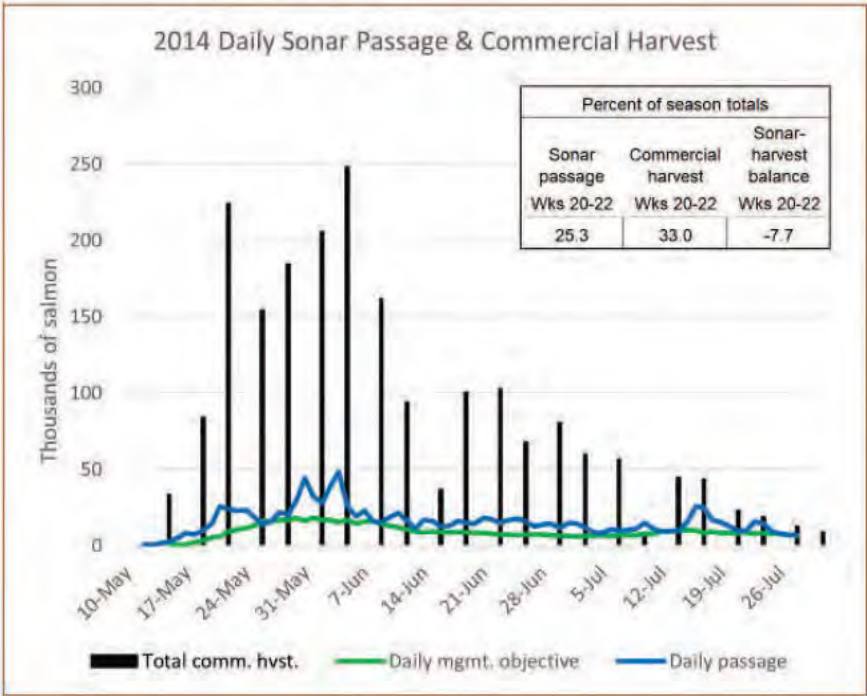
Note
different
y-axis



Data from Botz et al. 2014, Fishery Management Report No. 14-43

2014

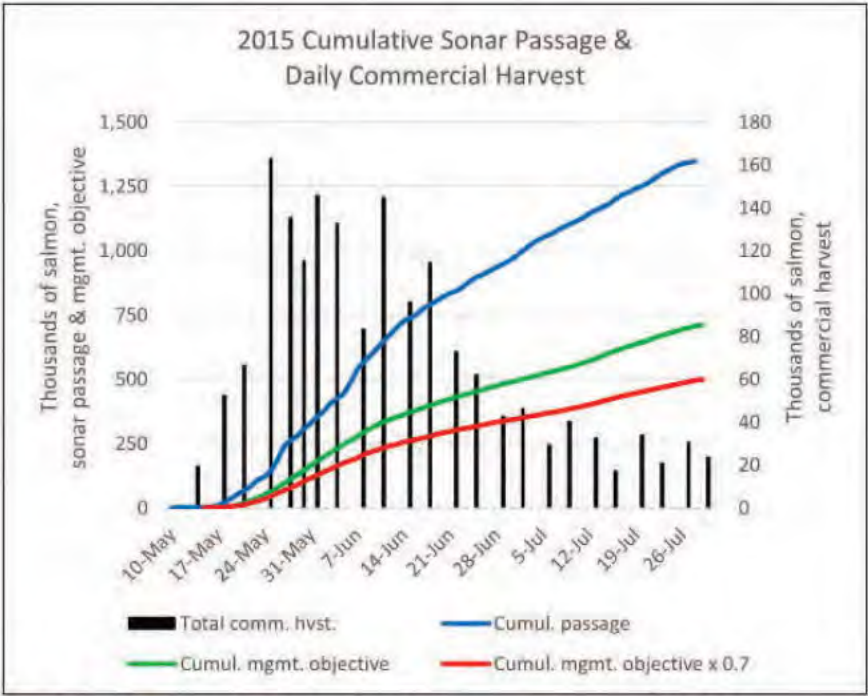
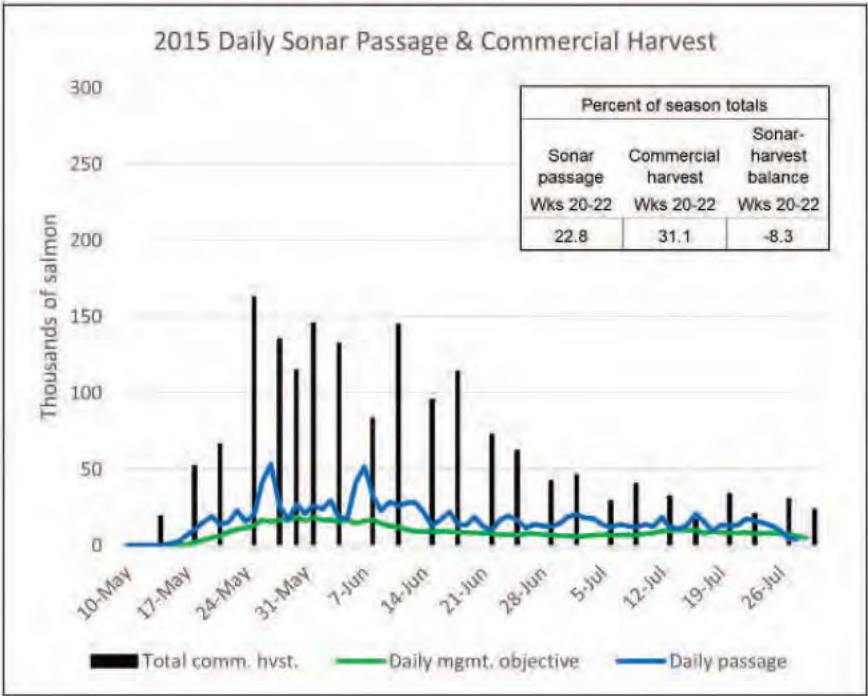
Note
different
y-axis



Data from Wiese et al. 2015, Fishery Management Report No. 15-34

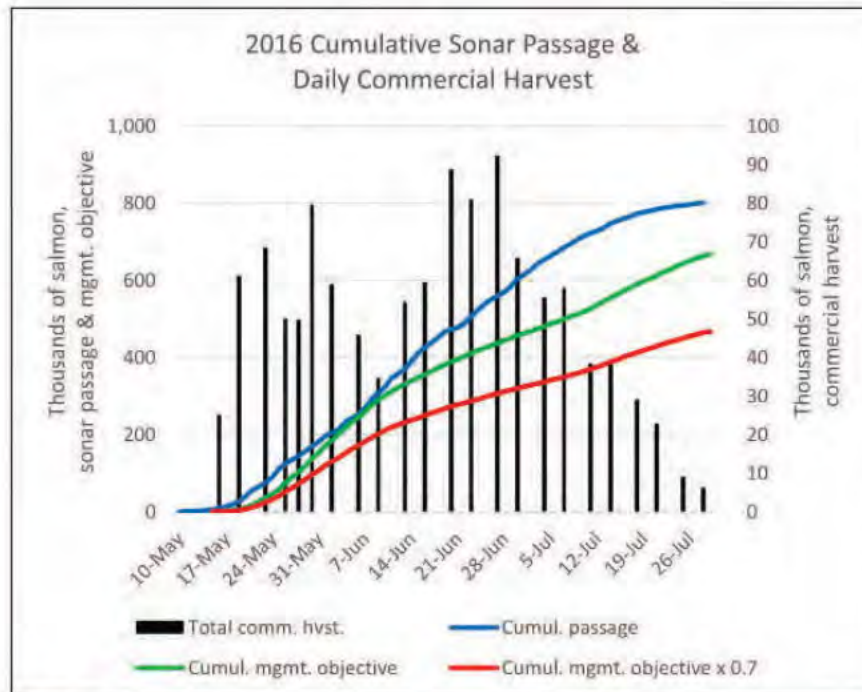
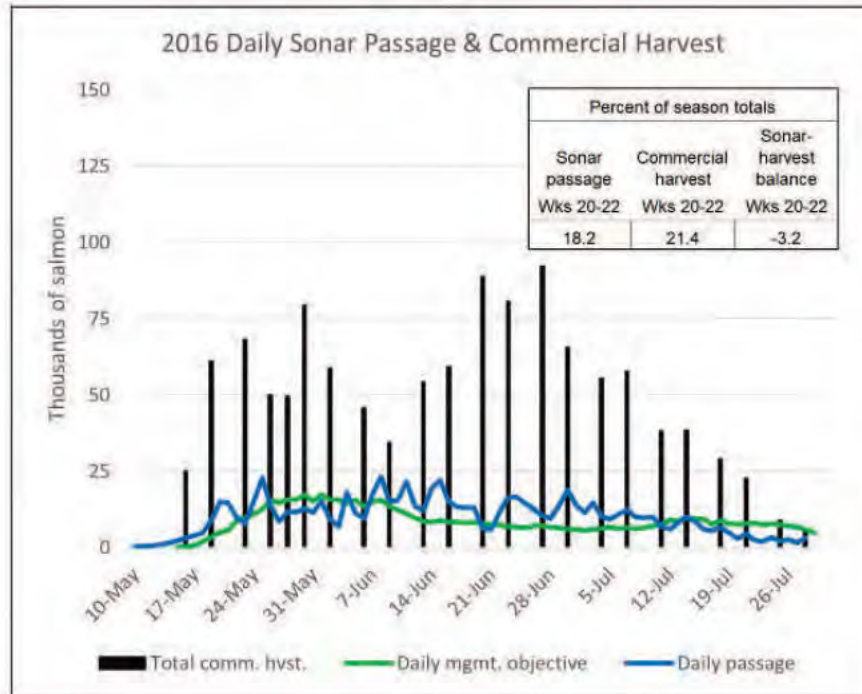
2015

Note
different
y-axis



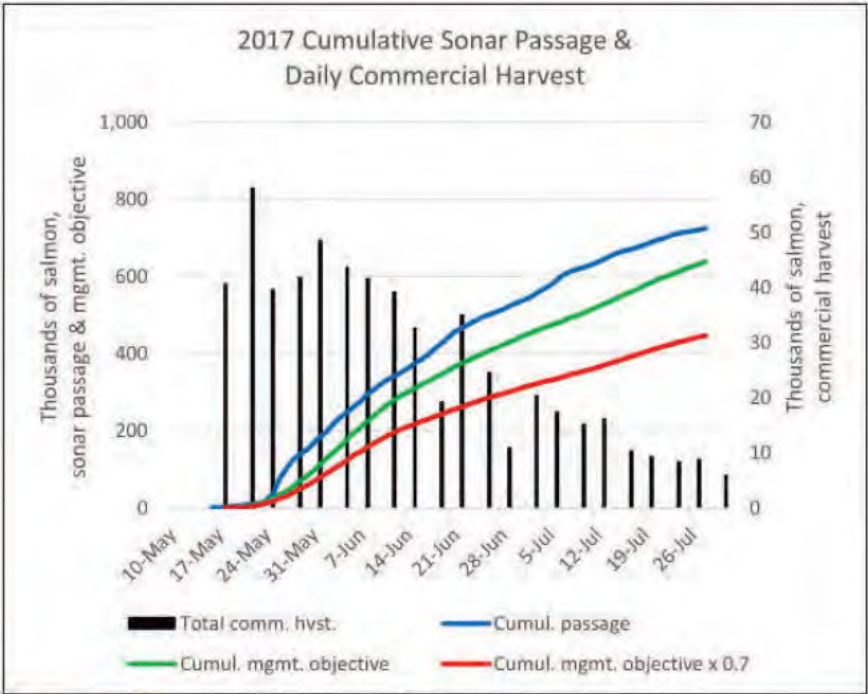
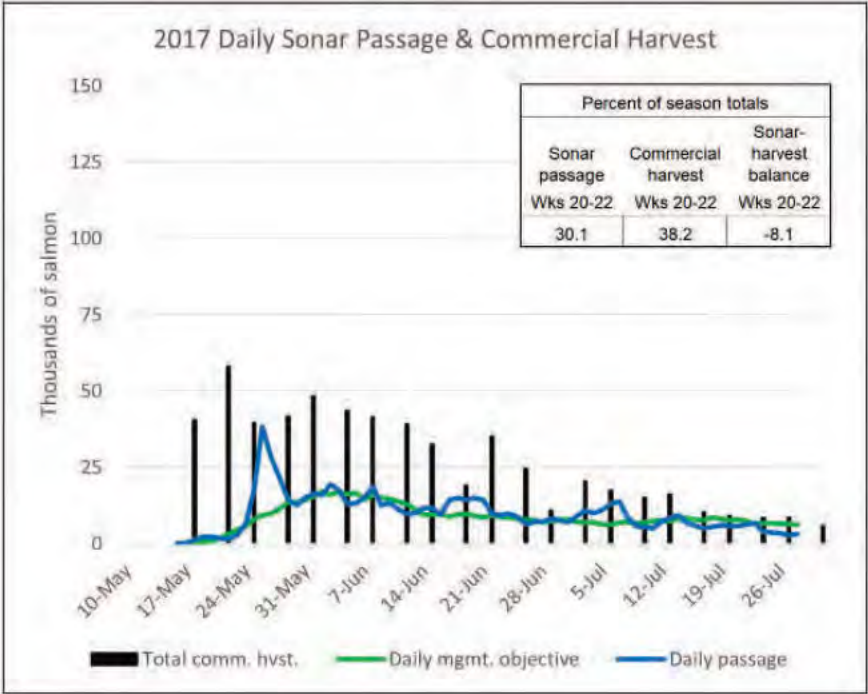
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2016



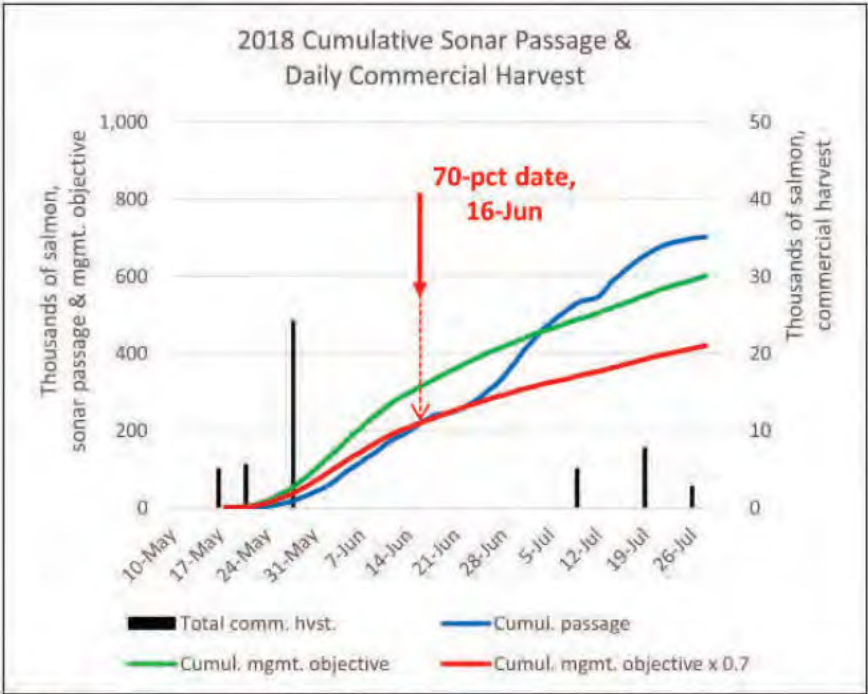
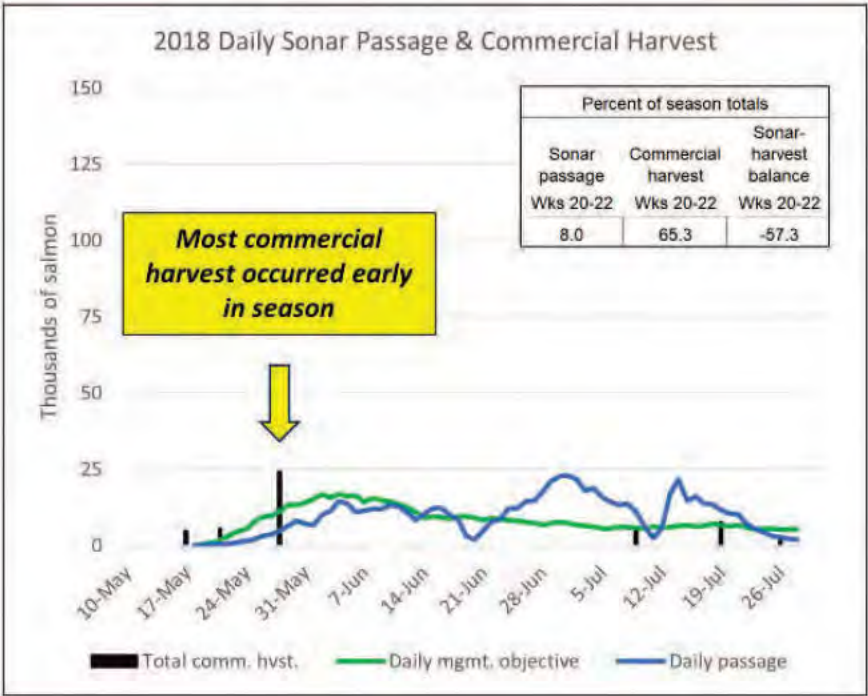
Data from Russell et al. 2017, Fishery Management Report No. 17-37

2017



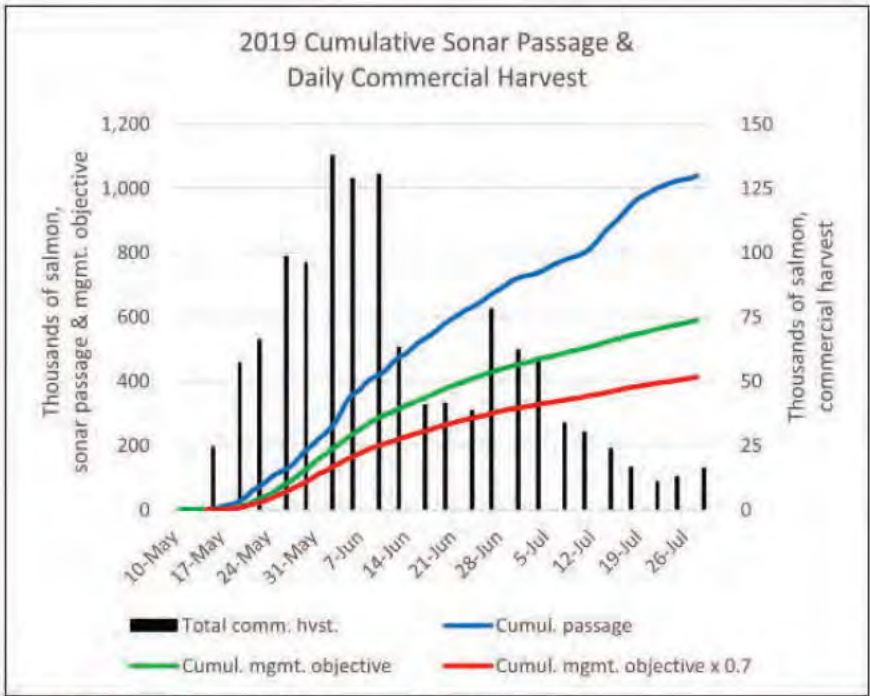
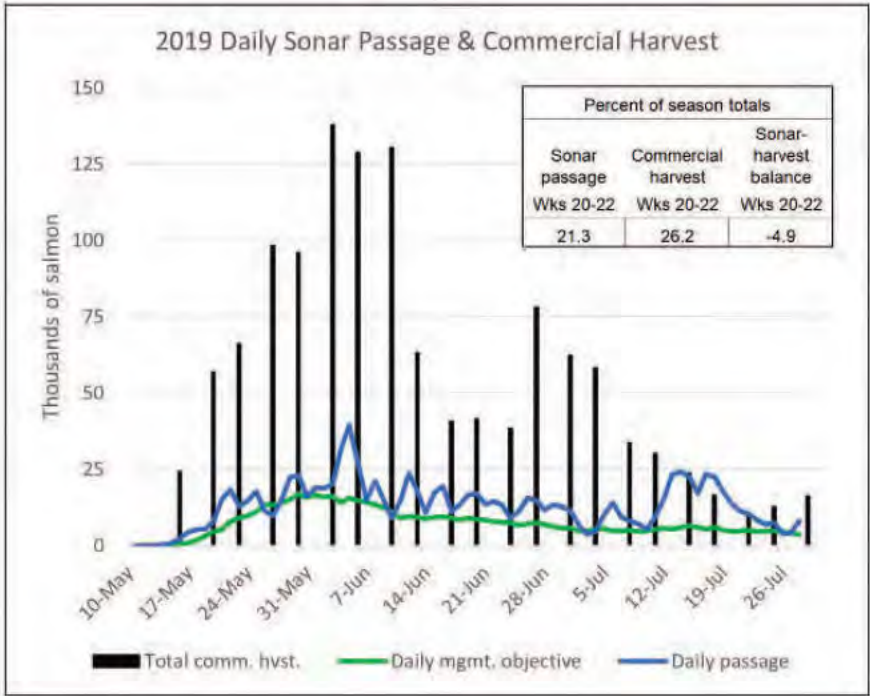
Data from Vega et al. 2019, Fishery Management Report No. 19-07

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

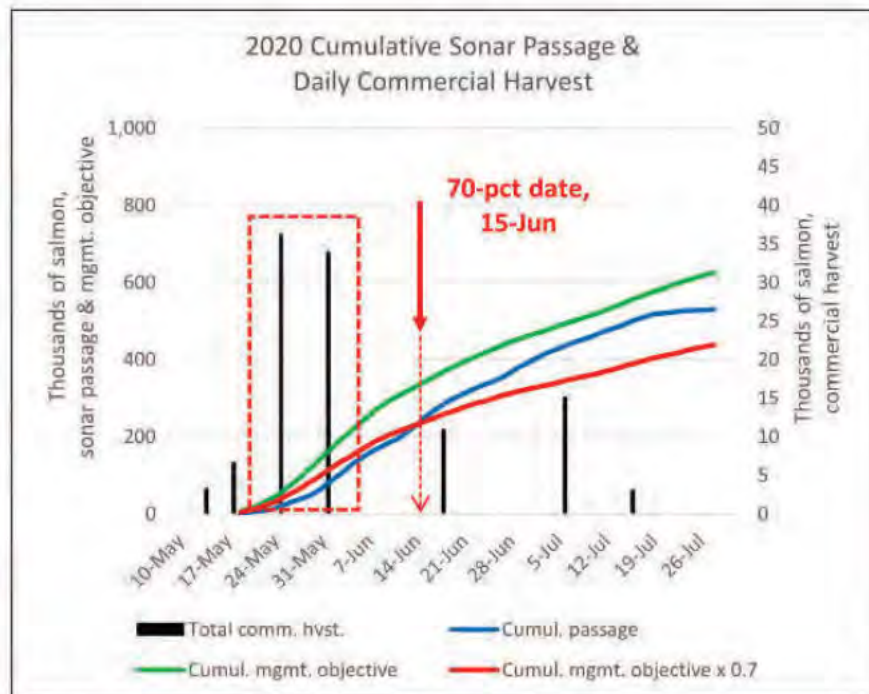
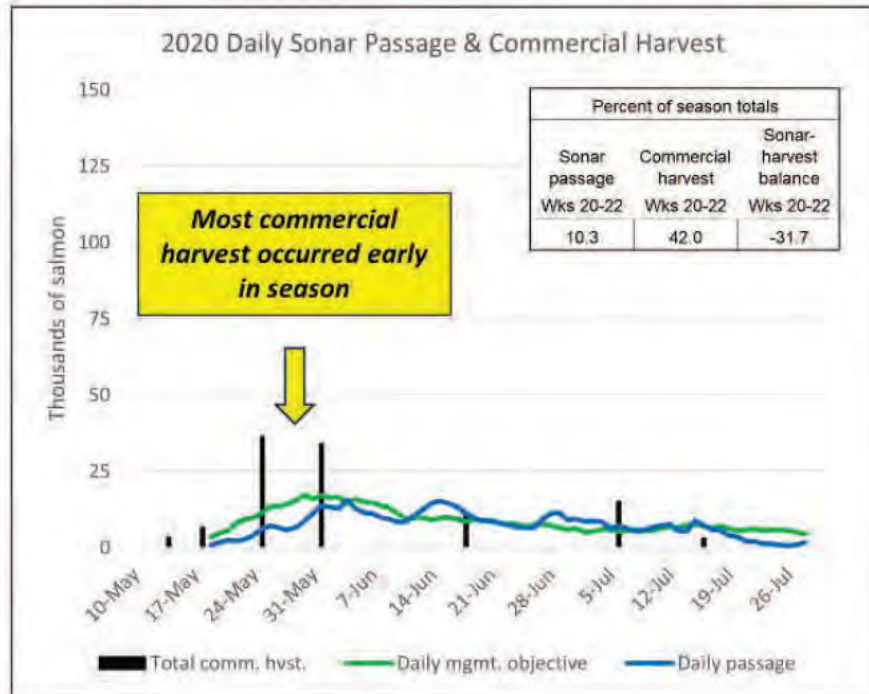
**Low sockeye
salmon run**

Escapement goal
360,000

Escapement estimate
362,445 salmon

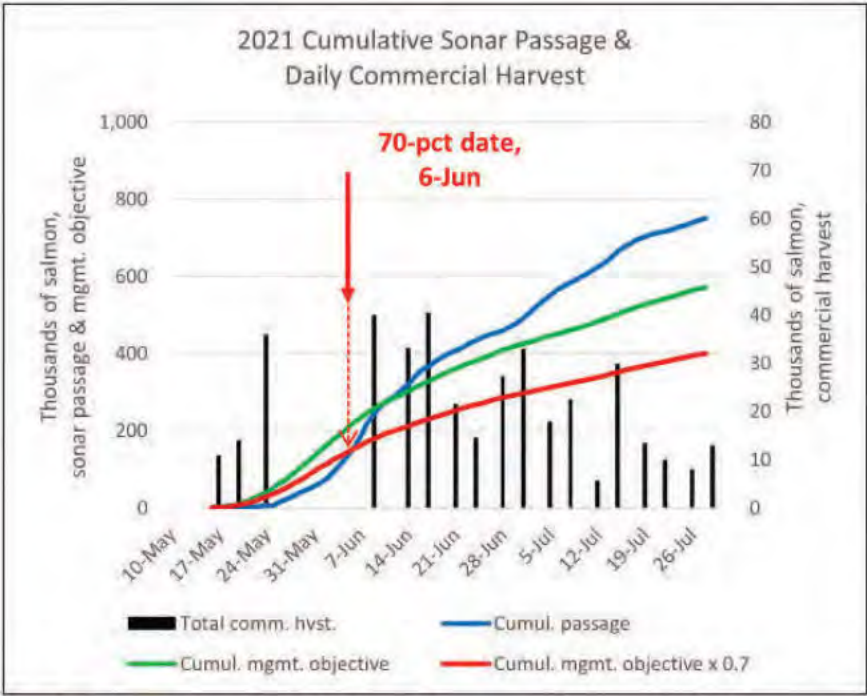
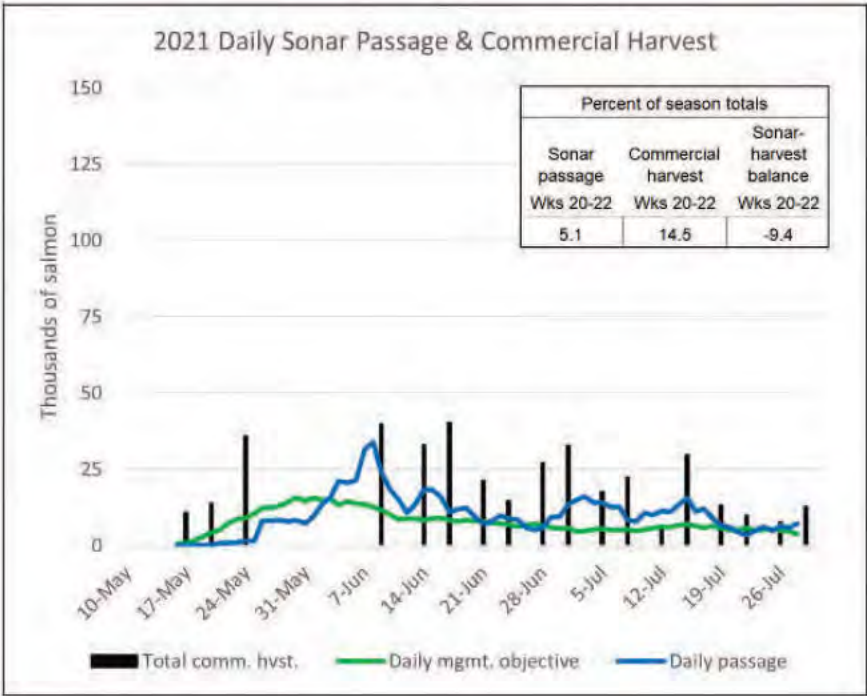
**Proposed 70-pct
threshold was not met
until 15-Jun.**

**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.**



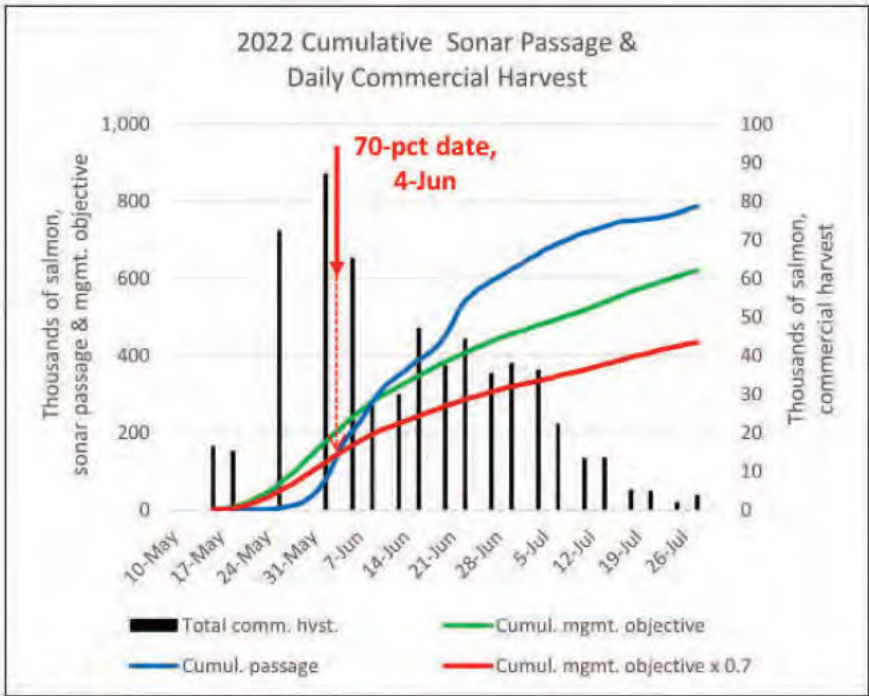
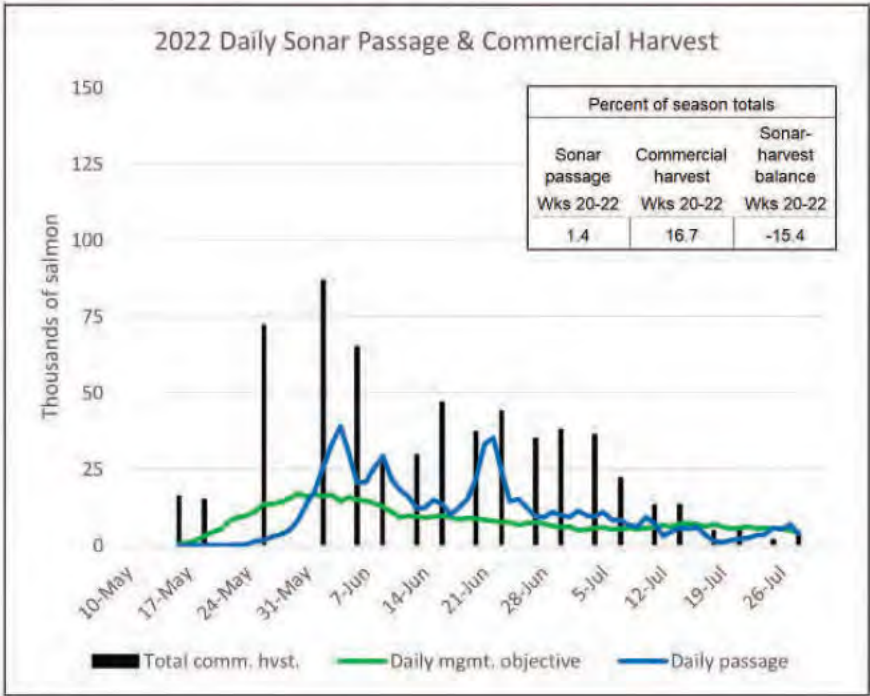
Data from Botz et al. 2021, Fishery Management Report No. 21-18

2021**



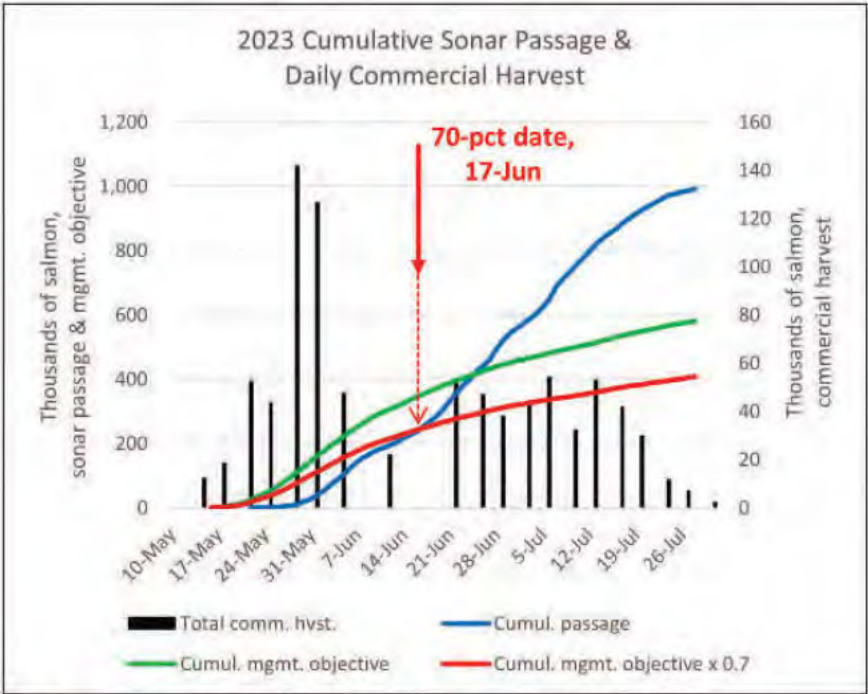
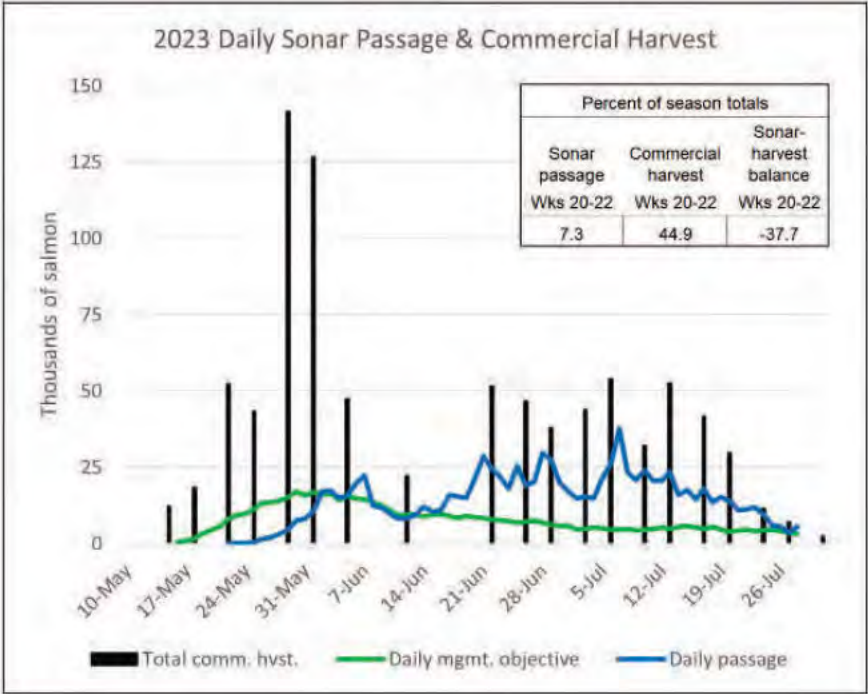
Data from Scannell et al. 2023, Fishery Management Report No. 23-06

2022**



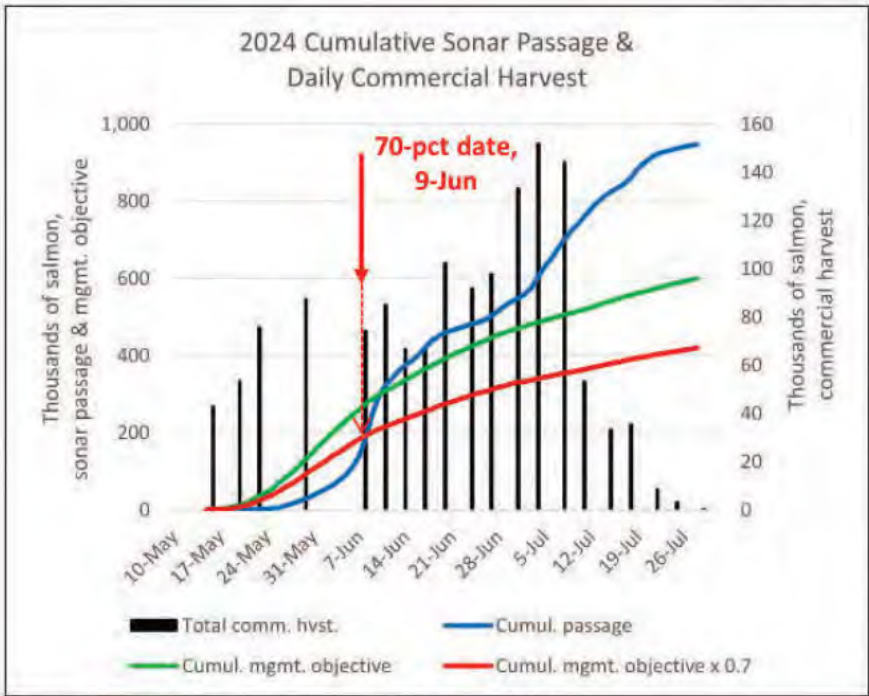
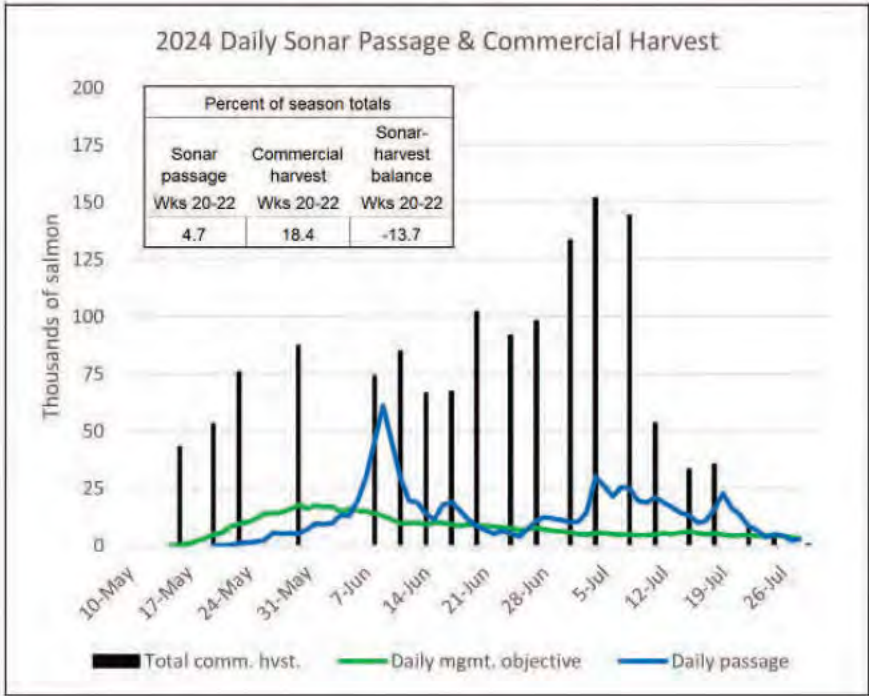
Data from Olson et al. 2023, Fishery Management Report No. 23-13

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		StatWk29	StatWk30	StatWk31	Total			
	StatWk20	StatWk21	StatWk22	StatWk23	StatWk24	StatWk25					StatWk26	StatWk27	
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		StatWk29	StatWk30	StatWk31
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.



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	-145,809	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	3.5	4.7	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	7.4	5.1	3.9	2.7
2008	-0.9	-18.1	-6.4	-8.6	-4.2	-25.4	-1.9	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	-2.2	3.0	-4.0	6.5	6.4	1.8	1.8
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	-4.0	6.5	6.4	1.8	1.8
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	-1.7	6.5	6.4	1.8	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	7.9	1.9	1.9	-0.1	-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	-0.2	3.6	3.2	-0.1	-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	0.1	5.3	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	4.7	4.5	-1.7	-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	0.5	0.1	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	2.2	0.4	-1.6	-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	10.5	3.2	-1.4	-1.4
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	10.5	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	12.5	5.8	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	-4.6	2.8	-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	-2.6	1.0	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	4.3	1.6	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	-7.2	6.1	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	1.9	2.4	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	2.3	2.8	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	2.3	3.4	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	0.5	3.4	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		Sum Wks 20-22	June		July		Stat Wk 28		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 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						

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.

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

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:

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 Governor Mike Dunleavy.

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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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. 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.

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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.

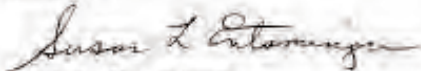
Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan

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

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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

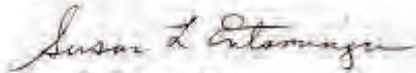
Page 2 of 2

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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:

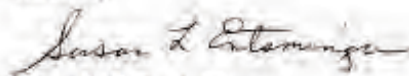
The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 4 and 5, 2024. The commission is a federal advisory committee that represents subsistence users of federal lands in Wrangell-St. Elias National Park and Preserve.

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:

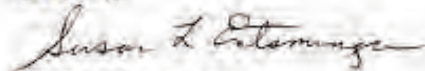
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Thank you for your attention to this important issue.

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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.

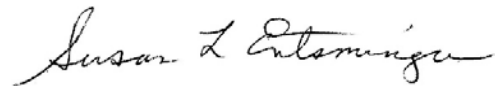
Proposal 70: Extend the lower boundary of the Chitina Subdistrict. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 70 due to conservation concerns about impacts to salmon. The proposed expansion area is a place that fish might rest before going into the 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.
